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7

*Attorneys for Defendant William H. Paris, Jr.*

8  
9 **UNITED STATES DISTRICT COURT**  
10 **NORTHERN DISTRICT OF CALIFORNIA**  
11 **OAKLAND DIVISION**

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 WILLIAM H. PARIS JR. a.k.a BUBBA  
PARIS,

16 Defendant.

CASE NO. CR 13-082 KAW

**DEFENDANT'S SENTENCING  
MEMORANDUM (MOTION FOR  
DEPARTURE OR IN THE ALTERNATIVE  
REQUEST FOR EVIDENTIARY HEARING)**

DATE: May 13, 2014  
TIME: 10:00 a.m.  
JUDGE: Honorable Kandis A. Westmore

1 William "Bubba" Paris, by and through his counsel respectfully submits this memorandum  
 2 to 1) rectify Defendant's unresolved objections in connection with the Revised Pre-Sentencing  
 3 Report (Hereafter, "RPSR") and 2) provide relevant information to this Honorable Court in  
 4 connection with the factors set forth in 18 U.S.C. § 3553(a) that collectively support a sentence of  
 5 probation for Mr. Paris.

6 The parties agree that calculations according to the United States Sentencing Guidelines  
 7 compute an offense of level 16—adjusted to a level 13. The maximum sentence in this case based  
 8 upon the plea to count 1, 26 U.S.C. §7203 (Failure to File a Tax Return), a Class A Misdemeanor  
 9 is 1 year imprisonment / \$100,000.00 fine.

10 In this case, the guidelines are not mandatory and act only as a "starting point" or "initial  
 11 benchmark" in the determination of Mr. Paris's individual sentence. *See Gall v. United States*, 552  
 12 U.S. 38, 49-51 (2007). The Supreme Court has directed that a sentencing Court "should then  
 13 consider all of the 3553(a) factors," and "make an individualized assessment based on the facts  
 14 presented." *Id.*

15 Section 3553(a) directs the Court to impose a sentence that is "sufficient, but not  
 16 greater than necessary," and requires the Court to consider "the nature and circumstances of the  
 17 offense and history and characteristics of the defendant." The Supreme Court, in affirming  
 18 sentencing courts' determinations to vary from the guidelines and impose sentences significantly  
 19 below guideline calculations, has held that information regarding the defendant's life and  
 20 characteristics are highly relevant, if not *essential*. *See Pepper v. United States*, (2011) 131 S. Ct.  
 21 1229, 1240; *Gall*, 552 U.S. 39. "It has been uniform and constant in the federal judicial tradition  
 22 for the sentencing judge to consider every convicted person as an individual and every case as a  
 23 unique study in the human failings that sometimes mitigate, sometimes magnify, the crime and the  
 24 punishment to ensue." *See Koon v. United States* (1996) 518 U.S. 81, 113. The Court in this case  
 25 has discretion to order a probation only sentence.

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**I. UNRESOLVED OBJECTIONS TO PRE-SENTENCING REPORT:**

**a. Procedural History Related To Pre-Sentencing Report**

Counsel for Mr. Paris received the RPSR on May 5, 2014 at 2:12 p.m. PDT. In a review of the RPSR, it is noted on page 16 of 20 that objections submitted by Mr. Paris in connection with the RPSR “have been resolved.” However, there are still unresolved objections that remain and these are important to note because they potentially bear on the characteristics and conduct of Mr. Paris. Realizing the potential impact on the Court’s determination, and on the relevant 3553(a) factors, efforts were made to resolve the unresolved objections to the RPSR with the United States Probation Office on May 5, 2014 via telephone and email.

In response to the original Pre-Sentencing Report (PSR) received on March 25, 2014, Mr. Paris first became aware that much of the “The Offense Conduct” detailed in the PSR was based on a Special Agent Report (SAR) that counsel for Mr. Paris had never seen before. Notably, all investigation reports related to this case were requested of the U.S. Attorney’s office in July of 2013. On March 27, 2014, counsel for Mr. Paris received a copy of the SAR for the first time. The parties stipulated to a continuance of the sentencing in this matter from April 8, 2014 to May 13, 2014 at 10:00 a.m.

After a review of the SAR in conjunction with the original PSR—it became clear that there were many details memorialized in the PSR that came from special agent Cindy Lin—an IRS special agent involved with the execution of the search warrant. Counsel for Mr. Paris sent a letter dated April 15, 2014 to the United States Probation Office, which set forth objections to the PSR and provided certain exhibits in order to effectuate a fair and accurate rendition of the “Offense Conduct,” much of which was based on double hearsay from the SAR of Ms. Lin. Some of the issues and objections have been resolved in the RPSR by the United States Probation Office, however some objections as addressed below are still unresolved.

**b. The Interactions Between IRS Case Agent Ms. Jeanine Burdoin And Mr. Paris Are Crucial As To The Issue Of Mitigation Related To PRE-Sentencing**

The Interactions between Mr. Paris and IRS Case Agent Burdoin as detailed in Paragraph 6 of the RPSR are based on double hearsay. The interactions are summarized by IRS agent Cindy

1 Lin of criminal investigations and these summaries are purportedly based on case notes and an  
 2 activity log of Ms. Burdoin who was working administratively with Mr. Paris to file substitute tax  
 3 returns after an Information Document Request (IDR).

4 It is important to note that in 2009, prior Mr. Paris being charged, Mr. Paris was actively  
 5 speaking and cooperating with Ms. Burdoin in order to rectify his failure to file tax returns. In  
 6 2009, Mr. Paris met with Ms. Burdoin on four occasions and provided her with voluminous  
 7 documentation regarding his income. However, Paragraph 6 of the PSR fails to adequately  
 8 describe the substantial interaction and cooperation between Ms. Burdoin and Mr. Paris—once  
 9 they made actual contact with each other. For example, the RPSR assumes that Mr. Paris failed to  
 10 make meetings that he actually knew about (4 occasions as stated in the RPSR) and failed to cancel  
 11 meetings on 5 occasions. An unfair interpretation of the statement would lead one to believe that  
 12 Mr. Paris was ignoring the IRS agent and was at a minimum—neglectful of his cooperation with  
 13 her on numerous occasions. Of further concern is that the language is based on double hearsay and  
 14 fails to adequately describe the several times Mr. Paris did attend meetings in an effort to  
 15 cooperate with the IRS in order to provide them with information and financial documentation. It  
 16 is critical to understand these interactions, and good faith conduct with the IRS, which are relevant  
 17 to the history and characteristics of Mr. Paris. During this time period of interaction between IRS-  
 18 RA Burdoin and Defendant, Mr. Paris was not represented by counsel and attended these meetings  
 19 on his own.

20 Ms. Burdoin's activity log sets forth that her first face to face meeting with Mr. Paris  
 21 occurred on April 28, 2009, after she had sent a letter to an address that she verified the Mr. Paris  
 22 lived at. After that point forward, Mr. Paris met with Ms. Burdoin on at least three more occasions  
 23 and provided her with ample documentation. As late as June 16, 2009, Ms. Burdoin's notes  
 24 indicate that Mr. Paris was cooperating and that they are both working on completing the  
 25 posIDR.

26 After providing extensive documentation of financial information mostly related to his  
 27 income, the only remaining documentation he could provide Ms. Burdoin was in connection  
 28 with his expenses—which would have only helped reduce his tax obligation. According to Mr.

1 Paris, whether he submitted the expense information or not—Ms. Burdoin told him that substitute  
 2 tax returns would be filed on his behalf no later than October 31, 2009. While it is true that Mr.  
 3 Paris missed one meeting that he knew about on September 9, 2009, the purpose of the meeting  
 4 according to Mr. Paris, was to provide expense documentation, which he did not have and thus  
 5 could not provide. Mr. Paris felt assured that he had provided all of the information required to  
 6 file the substitute returns to Ms. Burdoin, and resolved himself to the fact that he would pay a  
 7 higher tax penalty because he could not provide Ms. Burdoin with his expense information.  
 8 Unbeknownst to Mr. Paris, after he missed the meeting of September 9, 2009, he was referred to  
 9 the IRS criminal investigation unit—and ultimately charged with the 3 counts for violating 26  
 10 U.S.C. §7203.

11 To be clear, Mr. Paris accepts full and total responsibility under the plea before this Court. Mr.  
 12 Paris only seeks to have the full record presented at sentencing, so that the true context of Mr.  
 13 Paris' conduct and characteristics – both during the IRS audit of Ms. Burdoin, during the IRS  
 14 criminal investigation and during judicial proceedings up to now – may be fully set forth. Indeed,  
 15 “[p]ermitt[ing] sentencing courts to consider the widest possible breadth of information about a  
 16 defendant ensures that the punishment will suit not merely the offense but the individual  
 17 defendant.” *Pepper*, 131 S. Ct. at 1240 (citation omitted). Defendant hereby moves the court to  
 18 order the proposed language to be added to ¶6 of the RPSR as detailed in Exhibit 1 attached hereto.  
 19 In the alternative, based on the vast discrepancy of the events that took place between Mr. Paris  
 20 and Ms. Burdoin—prior to the execution of the search warrant in this case, it is respectfully  
 21 requested that the Court order an evidentiary hearing regarding the chain of events and interactions  
 22 between Ms. Burdoin and Mr. Paris in the year 2009. With regard to ¶8 of the RPSR, Defendant  
 23 moves the court to order the proposed language to be added to ¶8 as set forth in Exhibit 1.

24 **c. The Purported Statements of Mr. Paris As Described In Paragraph 9 Of The**  
 25 **RPSR Are Unreliable Hearsay Offered By An Unidentified IRS Agent**

26 Regarding Paragraph 9 of the RPSR, this paragraph from the SAR. It is unclear who Mr.  
 27 Paris was allegedly making the statements summarized in Paragraph 9. Regardless, if the Court  
 28 were to determine that this language should remain in the report—then Mr. Paris's explanation of

his interaction between IRS agents on the date that they executed on the search warrant should be added to provide a fair and accurate description. Defendant hereby moves the court to order the proposed language to be added to ¶9 of the RPSR as detailed in Exhibit 1 attached hereto.

**d. The RPSR Sets Forth Offensive Conduct The Defendant Had Negotiated Out Of The Plea Agreement**

Earlier drafts of the plea agreement included mention of previous years for which the Defendant did not file tax returns. This language was specifically negotiated out of the final plea agreement by the Defendant. Prior to the finalized plea agreement in this case being signed by Defendant, it was negotiated between the parties that the years memorialized wherein Defendant failed file tax returns would mirror the 2006, 2007, and 2008 charged violations. Yet, the RPSR sets forth in ¶6 that Defendant "last filed a tax return for tax year 1991". As such, Defendant hereby moves the court to order that language within ¶6 of the RPSR referring to a last filed tax return in 1991 be deleted. See Exhibit 1 attached hereto

**II. THE 3553(a) FACTORS SUPPORT A SENTENCE OF PROBATION**

The Supreme Court "has long recognized that sentencing judges exercise a wide discretion in the types of evidence they may consider when imposing sentence and that highly relevant--if not essential--to the selection of an appropriate sentence is the possession of the fullest information possible concerning the defendant's life and characteristics." *Pepper*, 131 S. Ct. at 1235 (citation and quotation omitted). "Congress codified this principle at 18 U.S.C. § 3661, which provides that no limitation shall be placed on the information a sentencing court may consider concerning the defendant's background, character, and conduct, and at § 3553(a), which sets forth certain factors that sentencing courts must consider, including the history and characteristics of the defendant, § 3553(a)(1). *Id.*

Attached to this sentencing memorandum, and as described below, please find various documents in which Defendant William "Bubba" Paris respectfully submits to this Honorable Court relevant to the factors set forth in 18 U.S.C. §3553(a) and for the Department's consideration.

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**a. Proof of Payment of Stipulated Restitution A**

Exhibit 2: Letter from Attorney Christopher Lavorato, enclosing Mr. Paris's restitution payment in the amount of \$126,530.00—with enclosed check #5614 sent to United States Attorney Thomas Newman on March 27, 2014.

**b. Mr. Paris' Commitment to Compliance With Tax Obligations**

Exhibit 3: Letter from Ronald R. Reagan, EA, MST, describing that Mr. Paris has retained him to manage his bookkeeping and income tax records. Mr. Reagan also assisted Mr. Paris in filing his 2013 tax return and will continue to assist with future tax return filings. Attached to Mr. Reagan's letter is his CV.

**c. Community Volunteerism and Outreach to Rancho Cielo Youth Campus in Monterey County**

Exhibit 4: Letter from Ms. Susie Brusa, Executive Director of Rancho Cielo Youth Campus. Ms. Brusa's letter sets forth the mission of Rancho Cielo and specific plan for Mr. Paris's involvement with the campus. Ms. Brusa's letter also sets forth an initial schedule of community service events in which Mr. Paris has already begun participating with Rancho Cielo. In addition to his other involvement with Rancho Cielo, Mr. Paris will be the keynote speaker on May 30, 2014 for the end of year academic award ceremony.

Exhibit 5: Letter from Paul J. Lee of Rancho Cielo—describing Mr. Paris' positive impact on the youths enrolled in the Youth Campus. To date, Mr. Paris has provided positive mentorship and motivational guidance to the youths enrolled at Rancho Cielo on two occasions and will continue to be involved with those youths for years to come.

**d. Various Letters of Support From Minor-Aged Students Mr. Paris Has Significantly Impacted**

Exhibit 6: Letter from Holly Zalytka;

Exhibit 7: Letter from Odassis Valdivia;

Exhibit 8: Letter from Caitlyn Khan; and

Exhibit 9: Letter from Andrew Dutra.

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**e. Various Letters of Support From Community Leaders Regarding Mr. Paris' Impact on Society**

- Exhibit 10: Letter from the Honorable Willie Brown, Jr. (former mayor of San Francisco);
- Exhibit 11: Letter from the Honorable Rusty Arias (former California State Assemblyman);
- Exhibit 12: Letter from Steve Higdon (Past Chair, Louisville Sports Commission);
- Exhibit 13: Letter from Coach Ron Madrick (former Head Football Coach of De Sales Catholic High School);
- Exhibit 14: Letter from Joseph C. Silva (President, Stockton Police Youth Activities);
- Exhibit 15: Letter from Kathy Eva (City of Eugene, Public Works Department);
- Exhibit 16: Letter from the Honorable Tom Torlakson (California State Superintendent of Public Schools);
- Exhibit 17: Letter from Dr. Cerrene Yvonne-Cervantes (Director, FAME Public Charter Schools);
- Exhibit 18: Letter from Joseph L. Prickitt, MS, RD. (Director Network for a Healthy California—Bay Area Region);
- Exhibit 19: Letter from Bob Schwartz;
- Exhibit 20: Letter from Dennis Costanza;
- Exhibit 21: Letter from Donald Borgwardt (Executive Director, Housing Authority of Madera);
- Exhibit 22: Letter from Gwen Bryant (USDA Forest Service);
- Exhibit 23: Letter from Pamela Pitts (former Vice Mayor, City of Vallejo, CA);
- Exhibit 24: Letter from Thomas Furey (former General Manager, IBM Silicon Valley Laboratory Software Engineers); and
- Exhibit 25: Letter from Doug Balatti (Assistant Chief, Bureau of Automotive Repair, Department of Consumer Affairs, State of California).

**f. Various Letters of Support From Spiritual Leaders**

- Exhibit 26: Letter from Pastor Anthony Summers (Senior Pastor, Impact Bible Ministries);
- Exhibit 27: Letter from Reverend Chris C. Vinculado (Good News Fellowship Church);
- Exhibit 28: Letter from Chaplain Earl A. Smith (Retired Chaplain—San Quentin).

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1                   g.       **News Articles and Recent Events**

2       Exhibit 29:    "Bubba Claus: 49ers rookie tackles his biggest role"

3       Exhibit 30:    "Bubba's Pitch to Kids"

4       Exhibit 31:    Various magazine pieces from *Delta Living* written by Bubba Paris

5       Exhibit 32:    Recent events

6       As the attached articles, report and letters recount, William "Bubba" Paris has and  
7 continues to be a compassionate, caring, generous member of our society. He has fed, mentored,  
8 and funded the education of others less fortunate through his philanthropic efforts. His good works  
9 and helping nature are well known and have provided life-long positive impacts on our youth.

10       These documents and materials demonstrate the most up-to-date picture of Mr. Paris'  
11 "history and characteristics." § 3553(a)(1). Additionally, Mr. Paris has paid the full amount of  
12 stipulated restitution, filed his most recent tax returns, and has hired an accountant to help organize  
13 his financial information, which collectively demonstrates the unlikelihood that Mr. Paris will  
14 engage in future offenses, "a central factor that district courts must assess when imposing  
15 sentence." *See, Pepper*, 131 S. Ct. at 1242; citing §§ 3553(a)(2)(B)-(C).

16       Furthermore, as Exhibit 33 illustrates, **a sentence of probation would not result in an**  
17 **unwarranted sentence disparity among defendants with similar records and circumstances.**  
18 As Exhibit 33 demonstrates, sentencing courts have imposed sentences of only probation for a very  
19 substantial number of defendants who pleaded guilty to violating the same statute violated by Mr.  
20 Paris, and where the offense levels were the same as Mr. Paris. *See* Exhibit 33, p. 4.

21       In light of Mr. Paris's exemplary life, except for this situation in which he stands before  
22 this Honorable Court—and in light of his continuing efforts to meet all the financial obligations  
23 resulting from his neglect, in light of the financial punishment he is already enduring because of  
24 his neglect, and the totality of factors provided to this Court, William "Bubba" Paris asks this  
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1 Court to impose a sentence of probation so that he can continue to rectify the situation for which  
2 he has accepted full responsibility for.

3 Respectfully submitted,

4 Dated: May 6, 2014

**COTCHETT, PITRE & McCARTHY, LLP**

5  
6 By: /s/ Christopher Lavorato  
7 **CHRISTOPHER LAHORATO**  
8 *Attorneys for Defendant*  
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# **EXHIBIT 1**

#### **RPSR PARAGRAPH 6 ADDITIONS AND REQUESTED DELETION**

As of the date defendant was charged, IRS records indicate that the defendant, William "Bubba" Paris last filed a tax return for the tax year 1991. On July 9, 2008, an IRS Revenue Agent (RA) was assigned to audit the defendant for tax years 1999-2007. According the Special Agent Report (SAR), Mr. Paris failed to meet with the IRS-RA on four occasions, and he did not call to cancel on five occasions. Mr. Paris met with the IRS-RA on four occasions but failed to provide complete documentation as requested by the IRS-RA. On February 9, 2010, the IRS-RA referred the defendant's case to the IRS Criminal Investigations Unit.

Mr. Paris indicates that he was unaware of any meetings that were scheduled prior to the first meeting that he attended with the IRS-RA on April 28, 2009. The record is unclear as to what address the IRS-RA was sending notifications of meetings prior to the meeting that was noticed for April 28, 2009. In addition to the April 28, 2009 meeting, the IRS-RA and Mr. Paris met on three additional occasions. Mr. Paris indicates that he submitted all income and financial information that he had in his possession or that he knew that was requested by the IRS-RA. Mr. Paris indicates that the only information he could not provide the IRS-RA were documents related to his expenses. The activity log of the IRS-RA dated 6-16-09 indicates that Mr. Paris was cooperating and that they are both working on completing the IDR. Mr. Paris indicates that he was told by the IRS-RA that she would be filing a report on his behalf in lieu of back tax returns no later than October 31, 2009 and that if Mr. Paris did not submit proof of expenses to her, he would not get credit for his expenses. Mr. Paris indicates that he was not able to locate his expense documentation and therefore did not attend a meeting to provide the IRS-RA with that documentation. Mr. Paris indicates that he expected that the substitute returns were going to be filed, however, his next interaction with the IRS was upon the IRS special agents' execution on the search warrant. Mr. Paris indicates that this came as a complete surprise to him as he believed the report (substitute tax returns) by the IRS-RA had already been submitted.

- In addition to the modification stated above, Defendant requests that the reference in the RPSR that Mr. Paris last filed taxes in 1991 be deleted as language was specifically negotiated out of the plea agreement referring to any failure to pay taxes beyond the three years charged.

#### **RPSR PARAGRAPH 8 ADDITIONS:**

Mr. Paris indicates that much of the documentation that was found during the search by IRS agents was the same documentation that he had previously provided to the IRS-RA

#### **RPSR PARAGRAPH 9 ADDITIONS:**

The IRS interviewed the defendant on the same date, and according to the SAR, Mr. Paris made admissions that he had knowledge of his duty to file taxes, and that he failed to comply. According to the SAR, the defendant stated that he knew that he owed back taxes and he did not want to deal with it because it was "too overwhelming." Mr. Paris stated, "I'm not trying to

hide. I know I owe.” Additionally, the defendant stated, “I didn’t want to avoid it, it just came to a point that it was easier not filing.”

Mr. Paris indicates that he never stated nor implied that it was easier not to file taxes. Mr. Paris indicates that at the time of the interview on the date of the search warrant execution, he believed that the IRS was filing substitute tax returns on his behalf based on his meetings with the IRS-RA. Mr. Paris indicates that the only thing that he could not provide to the IRS-RA was business expense receipts and that he had accepted that he would have to pay higher taxes because of that. According to Mr. Paris, he explained to the IRS special agent that he became overwhelmed in piecing together the receipts and that it was easier to accept a greater tax liability because he could not piece together his expenses.

# **EXHIBIT 2**



LAW OFFICES  
**COTCHETT, PITRE & MCCARTHY, LLP**  
SAN FRANCISCO AIRPORT OFFICE CENTER  
840 MALCOLM ROAD  
BURLINGAME, CALIFORNIA 94010  
TELEPHONE (650) 697-6000  
FAX (650) 697-0577

LOS ANGELES  
SACRAMENTO

NEW YORK  
WASHINGTON, DC

March 27, 2014

**VIA FIRST CLASS MAIL AND EMAIL**

Thomas Newman  
Assistant United States Attorney  
Tax Division Supervisor  
450 Golden Gate Avenue, 11th Floor  
San Francisco, CA 94102  
thomas.newman2@usdoj.gov

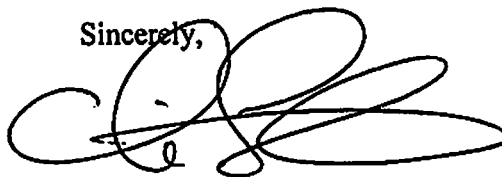
Re: *USA v. William H. Paris, Jr.*  
Case No. 13-CR-00082

Dear Mr. Newman:

Enclosed herein please find check # 5614, which is the restitution in the amount of \$126,530.00 pursuant to the plea agreement in this case.

Please advise my office with a letter confirming receipt of this check.

Sincerely,

A handwritten signature in black ink, appearing to read 'Christopher Lavorato', with a large, stylized flourish at the end.

CHRISTOPHER LAVORATO

Enclosure

cc:

JD Williams (U.S. Probation Office)  
Joseph W. Cotchett  
Bryan M. Payne

## STATE BAR ACCOUNT COTCHETT PITRE AND MCCARTHY

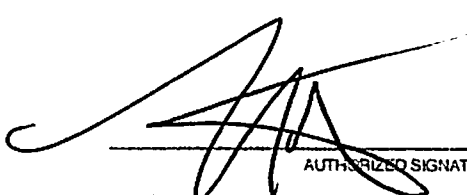
5614

Date	Invoice Number	Comment	Amount	Discount Amount	Net Amount
3/26/2014	140326	Paris, William-Restitution Case No. CR-13-082 KAW	126,530.00	0.00	126,530.00

Check: 005614

3/26/2014 The United States of America

Check Total: 126,530.00

<b>STATE BAR ACCOUNT</b> <b>COTCHETT PITRE AND MCCARTHY</b> SF AIRPORT OFFICE CENTER 840 MALCOLM RD NO. 200 BURLINGAME, CA 94010-1401		<b>WELLS FARGO BANK, N.A.</b> www.wellsfargo.com 11-4288/1210	5614
*ONE HUNDRED TWENTY-SIX THOUSAND FIVE HUNDRED THIRTY AND XX / 100		DATE	AMOUNT
		3/26/2014	*****126,530.00*
PAY TO THE ORDER OF	The United States of America		
		 AUTHORIZED SIGNATURE	Details on Back. Security Features Included
⑈0000005614⑈ ⑆121042882⑆ 8038763242⑈			

# **EXHIBIT 3**



**REAGAN MANAGEMENT SERVICES, INC.**

Business Management < Bookkeeping < Income Tax Services  
60 Eagle Rock Way , Suite C, Brentwood, CA. 94513 925/240-1242

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National Society of Public Accountants < National Association of Enrolled Agents < California Society of Enrolled Agents

April 9, 2014

To Whom It May Concern

This is to inform you that William (bubba) Paris has retained me to manage his bookkeeping and income tax records related to his profession as a motivational speaker. I am an Enrolled Agent, licenses by the Internal Revenue Service and have been in private practice for the past 35 years. I have attached a short BIO for your review.

I have known Mr. Paris for the past five years. I have agreed to help him by providing assistance and guidance with his financial records. The scope of that assistance will include training in the use of bookkeeping procedures and software. Also included will be an understanding of Generally Accepted Accounting Principles and the preparation of financial statements.

I have agreed to meet with Mr. Paris on a quarterly basis, or as needed, to review his bookkeeping and to help him remain compliant with his quarterly and annual income tax obligations.

I declare under penalty of perjury in accordance with the laws of the United States of America that the forgoing is true and correct.

Ronald R. Reagan, EA, MST

**Ref: Ronald R. Reagan, EA, MST**  
**60 Eagle Rock Way, Suite C**  
**Brentwood, CA. 94513**  
**(925) 240-1242**

**Ronald R. Reagan is licensed by the Internal Revenue Service to practice as an Enrolled Agent, (EA). Enrolled Agents are professional tax practitioners who are enrolled to represent taxpayers before the Internal Revenue Service. EA's are the only practitioners who are required to demonstrate competence specifically in matters of taxation. They are the only representatives for taxpayers who receive that right from the United State Government, rather than from individual states. I am authorized to practice in every state rather than just the state where I hold my license.**

**Reagan Management Services, Inc. (RMS), was established in 1979 to provide business management, bookkeeping, income tax services to local businesses in Contra Costa County. Since then, RMSA's client base has grown to include small businesses and individuals from around the world.**

**I served as the Sr. Accountant for the Central Contra Costa Sanitary District and Chief Financial Officer of Channel 42 Television prior to establishing our tax practice. I am a member of the Governing Board and Treasurer of the Noah Webster Educational Foundation which provides educational curriculum to home schools as well as public and private schools throughout the United States. I am a member of the Board of Directors of Open Door Incentives, Inc. which provides incentives to companies that provide food and clothing to people in need.**

**I hold a Master of Science degree in taxation from the Deming School of Business at William Howard Taft University in Denver Colorado.**

**I am a member of:**

**National Association of Tax Consultants**  
**National Society of Public Accountants**  
**National Association of Enrolled Agents**  
**California Association of Enrolled Agents**  
**Contra Costa County Aviation Advisory Committee**  
**Brentwood Rotary**

**I have served as:**

**Advisory Board Member, Presidio Bank, San Francisco**

**Pat president of the California Republican Assembly of Contra Costa County**

**Charter member of the Contra Costa Human Relations Commission**

**Mt Diablo Hospital Advisory Board**

**Brentwood Redevelopment Project Area Committee**

**Our office has been awarded "Best of Brentwood" in its' professional category by the readers of the Brentwood Press newspaper for the past thirteen years running. We were chosen "Business of the Year" in the 15<sup>th</sup> Assembly District, (when Brentwood was in that district) and nominated by the Brentwood Chamber of Commerce as "Business of the Year".**

**Ronald R. Reagan, EA MST**



# **EXHIBIT 4**



**Board of Directors**

**John Phillips**  
*President*  
*Superior Court Judge-Retired*

**Don Chapin**  
*Vice President*

**Dale Ellis**  
*Secretary*

**Robert V. Sanford, III**  
*Treasurer*

**Cass Antle**

**Karen Boothroyd**

**Ricky Cabrera**

**Gail Delorey**

**Adrienne Grover**

**Kendra Howell**

**Kelly McMillin**

**Michael Mueller**

**John Narigi**

**Jimmy Panetta**

**Nicholas Pasculli**

**Mike Zimmerman**

**Susie Brusa**  
*Executive Director*

**Mailing Address:**  
**Post Office Box 6948**  
**Salinas, CA 93912**

**Physical Address:**  
**710 Old Stage Road**  
**Salinas, CA 93908**

**Phone (831) 444-3533**  
**Fax (831) 444-3550**

**RanchoCieloYC.org**  
**Federal ID #77-0558859**



February 24, 2014

Mr. Chris Lavorato Attorney at Law  
Cochette Pitre & McCarthy, LLP  
San Francisco Airport Office Ctr  
840 Malcolm Road, Suite 200  
Burlingame, CA 94010

Re: Bubba Paris: Proposal for Meaningful Volunteer Work at Rancho Cielo Youth Campus

Dear Mr. Lavorato,

After meeting with Mr. Paris and with our staff, we see true benefit from Mr. Paris's interest in volunteering. Given his superior mentoring and inspirational speaking skills, we would be honored to see Mr. Paris once or twice a month to interact with our students. I have proposed a schedule below.

Located in California's richest farming region, the city of Salinas has become known as the "Salad Bowl of the World." Over the years, it has also gained notoriety for its youth homicide rate. With an average of 17 murders per year for the last 4 years, Salinas has become the epicentre of some of the worst gang violence in the nation. Just last year, there were a total of 26 police reported homicides. The total is just shy of 2009's record high of 29, with half of the victims under the age of 24.

Rancho Cielo Youth Campus hosts programs that promote self-sufficiency of our youth aged 16 – 24 through diploma education, vocational training, behavioral health services and job placement. In addition to training skills, our activities promote hope and gratitude, minimizing fear and violence. Employers tell us that while they can train to the technical aspects of their jobs, it's challenging to find entry-level employees with appropriate soft skills. This is an area where Mr. Paris's skill will be especially valuable to these young people, many of whom have a very narrow frame of reference.

Our plan is to have Mr. Paris visit with the youth several times leading up to their End-of-Year Academic Awards Ceremony on Friday, May 30. The students can get acquainted with him, as he can work with them in small groups as well as speak to the student body. At the End of Year Ceremony, Mr. Paris will also be able to address the families of our youth.

We have also planned a Speaker Series in our outdoor amphitheater that will be open to the public. Mr. Paris will be the summer highlight. We also have students on campus during the summer, whom Mr. Paris will mentor. The following semester starts in mid-August, with a new group of students. We hope that a public relationship with Mr. Paris will help recruit students to our programs, hoping to have a mentoring relationship with Mr. Paris.

Friday, March 21, 2014 @ 9:30 a.m. – speak to Silver Star Youth Program student body.

- Mentoring activities with SSYP students from 10 a.m. -12 p.m.

Thursday, April 10 @ 1:30 p.m. – speak to the John Muir Charter School student body

- Mentoring activities during the day, starting @ 9:30 a.m. with the Culinary Academy

Friday, April 25 @ 9:30 a.m. – speak to SSYP student body

- Mentoring activities from 10 a.m. – 1 p.m.

Thursday, May 8 @ 9:30 a.m. – mentoring with the Construction Academy Students

- Speak to the JMCS student body at 1:3

Friday, May 23 @ 9:30 a.m. – speak to the SSYP Student Body

- Mentoring activities from 10 a.m. – 1 pm.

Friday, May 30 @ 10 a.m. – Keynote speaker for the End of Year Academic Awards Ceremony for the SSYP students and their families

**Summer Schedule:**

- Evaluate the summer schedule. We have three summer sessions with the SSYP program.
- Recruiting Open Houses for Construction and Culinary programs occur every week during the summer.
- School starts mid-August.
- Schedule similar to above for the Fall semester.

**Summer Speaker Series:**

Daytime event on Saturday, July 12, 2014.

Mr. Lavorato, we believe that this relationship that Mr. Paris will develop with our youth will be life-altering for them. Thank you for facilitating the introduction of Mr. Paris to Rancho Cielo.

Further questions can be directed to me on 831.444.3503.

Sincerely,



Susie Brusa

# **EXHIBIT 5**



#### **Board of Directors**

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**Nicholas Pasculli**

**Mike Zimmerman**

**Susie Brusa**  
Executive Director

**Mailing Address:**  
Post Office Box 6948  
Salinas, CA 93912

**Physical Address:**  
710 Old Stage Road  
Salinas, CA 93908

**Phone (831) 444-3533**  
**Fax (831) 444-3550**

**RanchoCieloYC.org**  
Federal ID #77-0555859



### **Bubba Paris Tackles Rancho Cielo**

If you are football fan, or a venerable 49er fan, I'm sure I have your attention. If you are neither, you are probably thinking, "Who the hell is Bubba Paris?" Well, he's a motivational speaker. Now before you start texting me, put down your shoulder pads and I'll explain.

Born October 6, 1960, William "Bubba" Paris, by his own accounts, was one huge baby. He spent the next 18 years trying to fit in, when clearly he could not. Today, Bubba will tell you he discovered his destiny when he became an offensive tackle as a 2nd round pick for the 49ers in 1983. He was bigger in size and weight than the ideal offensive tackle. Well, these days, they're all his size. Seems he set the new standard, despite objections from Bill Walsh. Bubba has 3 Super Bowl rings playing for the 49ers. Not bad for a kid that couldn't do anything right and didn't fit in with the others. He clearly found his destiny, or part of it anyway. Those rings were stepping stones to his destiny as a motivational speaker. So, back to Rancho Cielo....Bubba came out to the Ranch to talk to our students. Impressed by the bling on his fingers, his legendary career and his ominous presence in the room, our students sat and listened to the story of Bubba's life, hanging on every emotion; connecting the dots of their own lives. Bubba's message was clear. Every student at Rancho Cielo is there for a reason, a purpose, to find the path to their destiny. Bubba spoke of having confidence in themselves; he spoke of courage and he challenged them to embrace the opportunities. So, did his message get through? It did to me. My role as a teacher, a chef, a mentor, is to awaken the desire in my students to be as great as they want to be; to find their purpose. For some, it will be small things, a compliment when they make a great roasted corn and shrimp bisque for Friday night dinner. For others, it's bragging rights to best sauté cook or make the best apple galette. We're not talking Super Bowl rings here. Yet, that inspiration can have the same affect. You can't wear it on your finger. Instead, you wear it in your heart and soul. These students, young culinarians, aren't going to "awaken" without our help. Who do you inspire and how can you "awaken" one of your cooks to be better than the job requires?

Thanks Bubba.

**Paul J Lee, CEC**  
Director, Drummond Culinary Academy  
Rancho Cielo Youth Campus  
chefpaul@ranchocieloyc.org

# **EXHIBIT 6**



Dear Bubba Paris,

I really appreciated you coming today. I have had recent depression problems and getting motivated seems like the impossible, but you coming today helped me know I actually HAVE a future, and it taught me to be brave, and wait for my purpose to be shown to me, because being dead isn't anyone's purpose. Well, at least I hope not...

I loved your personality and how you got really involved with the crowd. Thank you for coming today.

Sincerely,  
Holly Zalutka

ps. I'll also remember your shoe size. FOREVER!!

# **EXHIBIT 7**

Dear, Bubba Paris

You really inspired me because of what you said, I'm going through some struggles in my family but when you said that all the struggles that we're going through now is for a purpose, preparing us for one day I knew why this was happening. I'm sad that not everybody at school listened and didn't get the message, but I'm happy I did. Thank you, Bubba Paris for inspiring me even more to go through life. I hope when I retire I will be an inspiring speaker like you. God Bless you...

Yours Truly,

Odassis Valdivia...

# **EXHIBIT 8**

10-17-08

Dear Bubba Paris,

I will always remember this day! You have made this day so special to all of here at Southport. What I will always remember is your size 16 shoe!!! What touched me about your speech is now you realized who and what you were meant to be. I know I'm only in the 8<sup>th</sup> grade, but when I was in elementary school, I, too, was different. I wasn't pretty, nor smart, and I didn't have the nicest clothes; but, I did manage to make friends with my sense of humor. I left this school in the 6<sup>th</sup> grade and went to a country like school and found something I never had: self-confidence. I came back here to Southport with confidence. So I thank you Bubba Paris for reminding me who I am and touching us all here at Southport.

Always,

Caitlyn Khan  
2312 KINGSTON ST.  
W. SAC. CA 95061

# **EXHIBIT 9**



Dear Bubba Paris,

I thank you for coming to our school and taking time to talk to us. I think you motivated everybody that you spoke to, and I hope your goal or mission is fulfilled. I will remember all that you said to us "you are perfect from the top of your head, to the ends of your feet." You taught me to be who I am and not fake being who you are or wish you were different cause you know what you only get to be yourself onetime, and so you should make the best of it. Thank you Bubba Paris for coming to our school to talk to us.

Andrew



Andrew Dutra

# **EXHIBIT 10**

**WILLIE L. BROWN, JR.  
ATTORNEY AT LAW  
100 THE EMBARCADERO  
PENTHOUSE  
SAN FRANCISCO, CALIFORNIA 94105**

**TELEPHONE: 415.777.0310**

**September 9, 2013**

**To whom it may concern:**

**My friend, for more than 20 years, Mr. Paris is indeed a living inspiration, especially to young people. He is unusual, a high performing student in college, and an even higher performing athlete. Mr. Paris' personal integrity, his devotion to what he believes in, and his work ethic made him so special. Upon graduating from college, he went on to become a high producing professional football player of the San Francisco Forty Niners. And, he wasn't just a player. He was a team leader for a group of quality young men. He went on to achieve the status of being the best in their profession. Mr. Paris was the symbol. His on field conduct was exceeded only by his off field involvement with the communities and it's multiplicity of young people of all ages and races. He represented a living example of what is indeed possible in America. Bubba Paris is one of the best.**

**Regards,**

A handwritten signature in black ink, appearing to read 'Willie Brown', written in a cursive style.

**Willie L. Brown, Jr.**

# **EXHIBIT 11**



CALIFORNIA STRATEGIES, LLC

September 9, 2013

To Whom It May Concern,

I first met Mr. Parish and his wife when they were constituents of mine when I represented the 25<sup>th</sup> district in the California State Assembly. I was inspired and impressed with his passion, knowledge and his ability to bring out the best in others. William H. Parish, better known as "Bubba Parish" by his friends, family and fans, has translated his dedication and hard work he developed as an All American collegiate athlete at the University of Michigan and Super Bowl champion San Francisco Forty-Niner's off the field and into his community. Since retiring from the NFL Mr. Parish has inspired thousands as a motivational speaker, from Fortune 500 companies and two presidents to San Quentin Prison inmates. Bubba's faith and sense of community inspired him to form the Bubba Harris Friends of the Homeless, a nonprofit organization serving homeless communities in Bay Area. As an ordained minister Mr. Parish has continued to serve his church and community with compassion and distinction while inspiring his community with the hard work and dedication that he demonstrated throughout his career.

Sincerely,



RUSTY AREIAS

U.S. BANK PLAZA  
950 NINTH STREET, SUITE 2000 • SACRAMENTO, CA 95814  
TELEPHONE (916) 266-4575 • FACSIMILE (916) 266-4580

# **EXHIBIT 12**



August 29, 2013

One Riverfront Plaza  
401 North Main Street  
Suite 2200  
Louisville, KY 40202  
502.587.7767 PHONE  
502.587.6767 FAX  
866.587.7767 TOLL FREE

To Whom it may concern.

I am writing on behalf of William "Bubba" Paris. I have known Bubba personally for approximately three years. Of course, as a Louisvillian all of my life, I have known of Bubba since the late 1970s. Bubba is a hero in his hometown and as a former football player, and a big football fan, I have been a fan for nearly thirty years.

I served as the CEO of the Louisville Chamber of Commerce from 1999 – 2005. As a community leader, I have had the opportunity to meet and become friends with lots of big names from the world of business. Examples are Jack Welch, William Clay Ford and I even presented to President George W. Bush in the White House.

I was one of the community leaders who helped to start the Louisville Sports Commission in 2000. I have served on its' board ever since and had the honor of serving as board chair for nearly four years ending in 2011. Again, I have had the great fortune of meeting some of our truly great sports heroes including Muhammad Ali, Paul Hornung, Fuzzy Zoeller and Denny Crum. I can't recall many that I think as highly of as I do Bubba.

Three years ago I started a golf event for the Louisville Sports Commission called the Legends Open. It is an event that brings back the greatest athlete's in the Commonwealth's history to celebrate their accomplishments and to help honor their legacy.

Names that you might know include Dan Issel, Artis Gilmore, Paul Hornung, Junior Bridgeman, Gary Stevens, Chris McCarron, Louis Dampier, Danny Sullivan, Butch Beard, Darrell Griffith, Steve Cauthen, Otis Wilson, Tubby Smith and .....Bubba Paris among many others.

It wasn't particularly easy to find Bubba. You see, he hadn't been home in over 20 years and most didn't know where to find him. I finally got his number from the DeSales High School principal. I didn't know him but he loved the idea of me trying to bring Bubba home. DeSales is the Catholic school that Bubba attended. When I called Bubba to invite him to participate, he was a little taken aback. Of course he had no idea who I was or if I was legitimate. From everything I had heard, I didn't think we'd ever get him to commit.

Against what I thought would be very long odds, Bubba committed to come back home and participate. That was August and I met Bubba for the first time the following May at our Legends event. Not only did Bubba participate and have a great time, he was clearly a crowd favorite. Smiling, joking and truly

sharing his love with anyone who was interested. I think the person who became his biggest fan that day was my son Aaron, age 12 (picture enclosed.)

Something bizarre and horrible happened the week that Bubba flew back home for that first time in ages. In the west end of Louisville, Bubba's childhood neighborhood, seven young men were shot and killed in separate gang-related incidents. It made national news which is where Bubba read about it.

After our inaugural Legends tourney, Bubba sat me down. I had no idea what was coming. He brought up what happened in his neighborhood. Seven murders, all African-American young men involved in gangs and drugs.

Bubba told me how happy he was to come home and help the Sports Commission to raise money, but said that he had a lot more to offer than golf. He challenged me as the Board Chair to do something greater, through him, and that the next year he came back he wanted to get back to his neighborhood, schools, etc. and talk to the kids. He wanted to share his story to give hope to the hopeless. Of the 50 Legends/Hall of Famers that came home and golfed, Bubba is the ONLY one who challenged me to make the tourney more than golf and fundraising.

He suggested that with such a collection of huge sports legends, we could make a huge difference with the kids if given the opportunity. He then volunteered himself to help me lead the effort in expanding Legends golf tourney to include an altruistic focused-day geared towards improving kid's fortunes. Not for pay, but for the right reason.

I spent the next year putting together a program that we debuted in May 2013 called "Future Legends." The plan centered on taking about 20 kids who already actively involved with ways to improve their own lives through the First Tee program. First Tee is a very successful international program focused on teaching kids nine core values through the game of golf. The values are; honesty, integrity, sportsmanship, respect, confidence, responsibility, perseverance, judgment and courtesy.

I selected five Legends to mentor to kids. All Legends had a significant challenge to overcome in their own lives and each has successfully done so. Each Legend had a team of five kids and the kids were tasked with writing a story of how their mentor Legend overcame their life challenge through the nine principals of the First Tee program.

The inaugural Future Legends was presented this past May and it was very, very successful. Bubba was 100% the inspiration and leader of the program.

Aside of his Legend's appearances which he does not get paid to come home, Bubba has since been back to Louisville twice with the Kentucky Pro Football Hall of Fame. He was elected into the Hall last year. His High School Coach Ron Madrick gave the introduction for Bubba's induction. Coach Madrick is the one who challenged, supported and inspired Bubba him to become the man he is today. After Bubba's induction speech with most of the 1,000 people in tears, Bubba gave Coach Madrick one of his Super Bowl rings and thanked him for changing his life. Yes, he gave him his Super Bowl ring as a thank you!



Though I've only know Bubba for a few years. I feel like we are good friends. Primarily because he is such a reluctant, humble and friendly super star. He treats my son Aaron every time he sees him like they are best friends. Aaron talks about him all of the time. He thinks they are best friends. And you know what, I think they are.

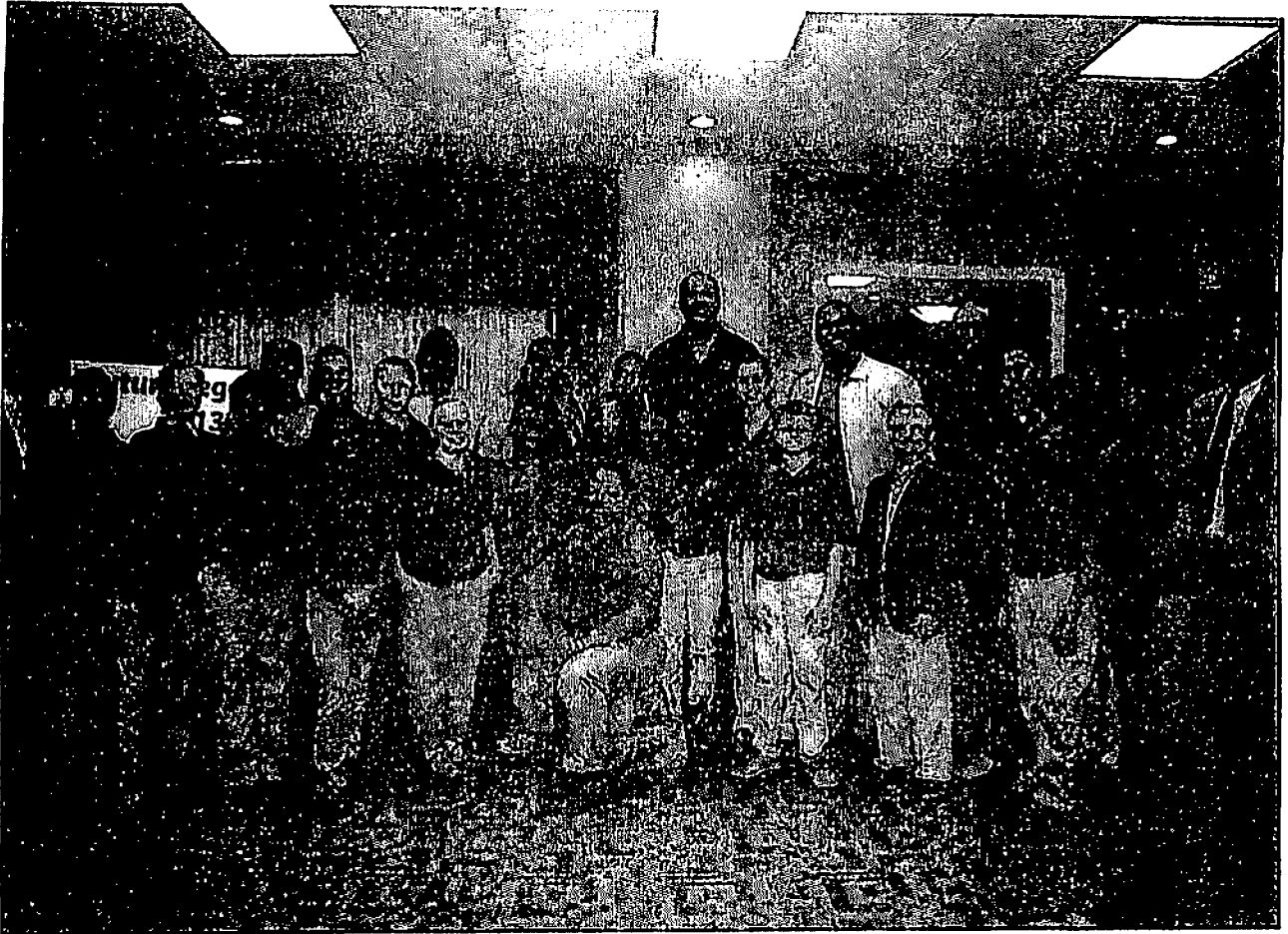
Bubba Paris is a GREAT role model, GREAT friend, and a GREAT man. I have four sons and I can only pray that they all end up as good as Bubba has!!

A handwritten signature in black ink, appearing to read "Steve Higdon", with a long horizontal line extending to the right.

Steve Higdon

Past Chair, Louisville Sports Commission

Encl: Three pictures - Bubba and my son Aaron; Bubba and his Future Legends team; Bubba and me (far right) with the Future Legend participants including NBA Hall of Famer Artis Gilmore, Cleveland Brown Hall of Famer Frank Minnifield, Thoroughbred Racing Hall of Fame jockey, Pat Day, Arizona State basketball Hall of Famer Kym Hampton and Kentucky Athletic Hall of Fame inductee George Tinsley





# **EXHIBIT 13**



September 1, 2013

To Whom It May Concern

RE: William Paris Jr.

4096 Beacon Bay

California, 94505

This letter is in regards to a great friend and role model to many people all over our country. William "Bubba" Paris has been an inspiration to me from the moment I first met him. William was a sophomore at De Sales Catholic High School, Louisville, Ky in 1976. I had recently been appointed as the Head football Coach at De Sales which is a private school with a very small minority population. Not to over-dramatize his situation, however he had to endure many, unfortunate racial judgements from some of the faculty members and students. He also traveled by city bus service one hour each way to get to school. It took three busses to accomplish that. In spite of a trying environment, he never lost his focus of trying to reach his goals as a student athlete. After his junior year, we were convinced that he would have a great chance to literally name his college of choice. However, during his first three years at De Sales, he attended a vocation program for half of the school day. Consequently, his academic core classes would be short the needed credit to attend a major university. We were able to convince the academic leader at De Sales to look at his situation and give us some direction that we could take to correct the problem. He was short at least three credits. We had faculty offer to assist with these classes on a one to one basis. Of course, he still had to complete his regular senior requirements. He did accomplish this by going to school early every day and staying after school as well as working through Christmas and spring breaks to be able to take the classes needed. His motivation really excited an entire school by his determination. At this point in his life, things had started to go in his favor due to his character and determination to overcome any challenges.

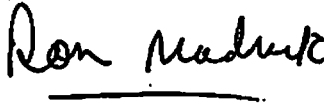
After his senior season, he would accompany me and speak to the many young men on the west side of Louisville. Those young men really looked up to him. His appearance, confidence and message was always the highlight for those youngsters who, like Bubba, did not have a father in their lives. His ability to speak from his heart has made him a well recognized and accomplished "Motivational" speaker all across our country. He has a strong message to deliver, and what group he addresses, it is always faith oriented. I have had the pleasure of attending many of his talks and always come away with a great feeling and comfort, knowing that the young man I met in 1976 as a 14 year old would matriculate at the University of Michigan, go on to a fabulous professional career in the NFL. Knowing many of his former coaches and players, I know in my heart they will all attest to his being a man of great faith and character. He has had to overcome many obstacles in his life and because of the strength he draws

from his faith and support of hundreds, he has overcome every challenge and obstacle. He shares his life experiences through the motivational speeches he gives. He has a very charitable heart and has made great sacrifices at times, never failing to avail himself. He has appeared at multiple fund raisers for charity. My last visit with William was in San Francisco, last fall. William invited my wife and I to a group of several Christian churches that were raising money and food for the people of Haiti. His talk about being a Christian and stepping when God calls upon us to help was so inspiring that he received a standing ovation from those wonderful people. William lives in that community and still to this day assists in helping carry out the mission of those Christian churches.

I remember when Bubba took it upon himself to try and raise the hopes and spirits of the many homeless people in the San Francisco Bay area. He provided shoes, clothing, food, and whenever possible shelter for these people. Although, he knew in his heart that he alone could not save all of these people, he tried to bring awareness to their circumstances. I have been a football coach, teacher, and administrator for 48 years. During that career I was blessed to be associated with great young people. But, in my heart, no one has been able to project the message of faith, charity, honesty, and character more than William Paris. It is an honor to be his friend.

Sincerely,

Ron Madrick

A handwritten signature in black ink that reads "Ron Madrick". The signature is written in a cursive style with a horizontal line underneath the name.

# **EXHIBIT 14**



**“MAKING A DIFFERENCE FOR OUR YOUTH”**  
SPONSORED BY THE STOCKTON OPTIMIST CLUB, UNITED WAY OF SAN JOAQUIN AND  
THE STOCKTON POLICE OFFICERS ASSOCIATION



22 E. MARKET STREET - STOCKTON, CA 95202 (209) 937-8209

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TO: WHOMEVER IT MAY CONCERN

**BUBBA PARIS**

I would like to start out by saying Bubba Paris has actively participated in the Stockton Police Youth Activities Benefit Basketball Game for over a decade. Bubba is very instrumental for the success of the game and he creates a fun and safe atmosphere during the game.

An example of Bubba's fine performance at the game, includes talking to the kids about the harmful effects of drugs and gangs. I personally have heard from many parents, year after year, that Bubba's speeches have made a positive impact on the lives of their children.

Each year, I always look forward to this game because I know Bubba makes a difference in our community. I recommend Bubba for any endeavor he sets out for.

Any questions, please feel free to call me at (209) 937-8209.

*Joseph C. Silva*

OFFICER JOSEPH C. SILVA  
PRESIDENT, STOCKTON POLICE YOUTH ACTIVITIES

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COORDINATORS**

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*Katherine Crawford*  
*Jr. Cadets*

*Steve Salas*  
*Boxing*

*Ivan Rose*  
*Karate*

*Jesse Kenyon*  
*Youth Enrichment*

*Joseph C. Silva*  
*Mario Arroyo*  
*Frank Guerrero*  
*X-mas Toy Drive*

*Jaine Constantino*  
*"Legally Undercover"*

*Steve Arsenault*  
*Benefit Basketball*

*"We help make Stockton a great place to grow up!"*



# **EXHIBIT 15**



Public Works  
Administration

September 9, 2013

To Whom It May Concern;

In April 2008, William "Bubba" Paris, gave a two hour presentation on the topic of homelessness – the impact on the homeless and public works departments and what we can do. He spoke at two diversity workshops hosted for city staff.

Mr. Paris used his personal experience in his community in working with those who are homeless and what he has done to help. His presentation generated quite a few questions and several people stayed to speak with him afterwards.

At the time of Mr. Paris's visit, I was a member of our public works diversity committee and oversaw his personal services contract.

Respectfully,

A handwritten signature in cursive script that reads "Kathy Eva".

Kathy Eva

Public Information Specialist

City of Eugene Public Works Dept.

# **EXHIBIT 16**

**TO WHOM IT MAY CONCERN:**

**I welcome this opportunity to write about my friendship with Bubba Paris.**

**Before I met him personally, I knew Bubba as a Super Bowl football player for the San Francisco 49ers. I am sincerely grateful that I have had the opportunity to get to know Bubba as the kind and caring man who inspires children and adults with his presence and motivational talks.**

**I first met Bubba in November of 2001 when he agreed to be the featured speaker at my Teen Town Hall meeting. I was in the California State Senate at the time. This event was planned by my high school interns in response to the flood of inquiries and concerns my office received from students, teachers, parents and community leaders about religious and cultural intolerance in our schools after the horrific 9-11 terrorist attack. The theme of the town hall centered on the questions of tolerance, trust, and religious and cultural values. The students planned and conducted the meeting. Bubba was the only adult on the program. He gave a powerful and inspirational speech that hit the point with the students and adults alike. From that point on we became good friends.**

**Since that first connection, Bubba has generously given of his time and celebrity-status to help me promote projects and legislation that positively impact our young people. He has attended meetings and participated in important task force work. I was proud to have him among a panel of speakers for my inauguration as State Superintendent of Public Instruction.**

**Bubba has continued to be a spokesperson for Team California for Healthy Kids to promote a healthy and fit lifestyle with our young people. When called upon, he was willing to attend task force meetings and was among the featured celebrity athletes during the kick-off of the healthy kid's campaign.**

**I am proud and grateful to call Bubba a partner in efforts to improve education for our students.**

**Sincerely,**

**Tom Torlakson**

# **EXHIBIT 17**

August 30, 2013

To Whom It May Concern:

I am writing this letter to apprise you of the wonderful contributions Hubba Paris has made to young people and educators. I met Mr. Paris in 2008 at a school administrator's conference and I was so impressed with his message and presence that I knew I wanted to recruit him to speak to a group of elementary students and prospective educators. I invited him to speak at two events; The Day of Respect at an elementary school and a staff meeting at a university.

When I was a special education teacher, I initiated a Day of Respect at Southport Elementary School in West Sacramento, CA in conjunction with the school's character education. I lived in the Southport area and so, even after I left Southport to become a principal, I remained the coordinator for Southport's Day of Respect. After meeting Mr. Paris, I just knew Southport Students would relish the opportunity to hear him speak. Little did I know that parents would also enthusiastically respond to Mr. Paris' presence at our school and on the day of the event, our auditorium was packed with an audience of educators, community members, students, parents and caregivers. We had a wonderful turnout for the Day of Respect and after giving his presentation, Mr. Paris could have left. Instead, he stayed to speak with the students, who surrounded him like a rock star. He graciously signed autographs and answered questions. Students and parents were touched by his warmth and I was humbled by his generosity when Mr. Paris, waived his usual fee. His presentation was the focal point of the Day of Respect that year and his presence made it even more meaningful and memorable. You could see students nodding their heads and considering his words. Afterwards, the students expressed a desire to thank him so they made cards that were mailed to Mr. Paris.

As if his initial generosity was not enough, Mr. Paris agreed to provide a presentation at Chapman University, where I served as Chair of the Education Department. His presentation helped teachers understand the value of character education and afterwards, I noticed increased enthusiasm and appreciation for character education in schools. Prospective teachers, who once questioned the value of character education in the schools, were suddenly transformed into advocates of character education. Mr. Paris spent his Saturday with us and again, waived his usual fee.

Mr. Paris has shown me he is a man of true character and integrity. He represents the values we educators try to teach our students: integrity of your word, setting goals, how to gracefully handle success and remembering to give back to the community. It was a pleasure to meet him and I am sure I will call upon him again to give his time and talent to influence another generation of educators and students.

Sincerely,

Dr. Cerrene Yvonne-Cervantes  
Director  
FAME Public Charter Schools  
cerreneyc@aol.com  
(916)747-5965

# **EXHIBIT 18**

Great Things Start with Good Health

August 29, 2103

To Whom It May Concern:

It is my honor and privilege to provide a letter of character reference and support for Mr. Bubba Paris.

As the Director of the Network for a Healthy California – Bay Area Region, I retained the services of Bubba Paris to speak at one of our conferences about the importance of a healthy lifestyle, particularly as regards healthy eating and physical activity.

Mr. Paris was an inspiration to everyone who had the good fortune to attend this conference. He shared with us many personal experiences of his life, both the triumphs and the pitfalls, and he spoke about his personal struggles with his own health as regards overweight/obesity and diabetes. He spoke about love and compassion and the need for all of us to support and help one another to be the best that we can be. He also reminded us that there is a higher power, and that we are all answerable to this higher power and as such we all need to be respectful of one another and do our best for ourselves and for each other.

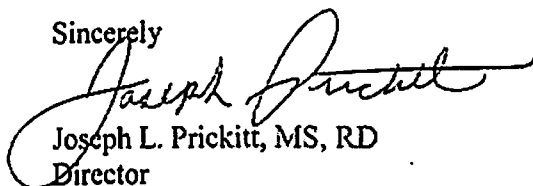
Mr. Paris truly inspired everyone who attended this conference. Bubba Paris made a difference in my life, and in the lives of all the participants who attended this conference, as he has made a positive difference in countless others lives over his lifetime.

I sincerely ask that you consider the good works of Mr. Paris, and consider the many individuals whose lives are better for his work as a pastor, motivational speaker and change agent for good.

Mr. Paris is truly an asset to the community. He is making a difference in the community. We all need Bubba Paris to continue his work to inspire all of us to lead better lives. His message is most important when we do fall down, when we do fall short and when we do make mistakes. It is very important to have individuals like Bubba Paris share his own challenges and be a source of inspiration for us all, particularly in such difficult times.

In closing, I would ask that you treat Mr. Paris with compassion which is the foundation for building a more humane world.

Sincerely



Joseph L. Prickitt, MS, RD  
Director

Network for a Healthy California – Bay Area Region  
1400 Parkmoor Avenue, Suite 120B  
San Jose, Ca 95126

Santa Clara County  
**PUBLIC  
HEALTH**



# **EXHIBIT 19**

August 29, 2013

To whom it may concern,

My journey with Bubba Paris began 25 years ago while working with him at the San Francisco 49ers. I am honored to call him my friend, and even more honored to share my thoughts about his amazing impact on the world, my life, and the lives of countless others.

From the beginning, there was just something special about Bubba; he had a gleam in his eye and he was not "just" a professional football player. He looked around him with a human compassion I'd not seen before. He saw himself as an open conduit to share the blessings he'd received with those around him in need. I got to work with him on a professional level, but got to KNOW him on a personal level as we walked through life together. His constant reminder to me and others was "to whom much is given, much is expected." Everyone who encounters Bubba comes away inspired to do more for others.

If you've never been awarded a marketing contract with a major shoe manufacturer, it is difficult to explain how much those shoes mean. First, you get to order 200 shoes in your size and have them custom made just for you. Most people proudly display them, and wear them for the rest of their life as trophies of a major accomplishment. Bubba wears a size 15, but his shoe order was for 200 pairs of shoes in all sizes. Bubba quietly took all 200 pairs of shoes down to St. James Homeless Park in San Jose; and then began to hand them out and help homeless people try on different shoes until they found ones that fit. 200 homeless people went home with new shoes that day due to Bubba's generosity. Bubba asked for nothing in return, and had a kind word of encouragement for each person and spoke a gentle "God bless you" over each person as they left with new shoes. I was deeply inspired, and I knew that I was destined to be a better person by spending time with Bubba.

Bubba's generous heart was amazing. For example, one Thanksgiving Bubba went down to Safeway and asked the store manager to find out how many turkeys would fit in his suburban. He wrote a check for them out of his personal account, and delivered them to City Team Ministries. City Team Ministries is a Christian based organization that feeds the homeless, the drug infected and alcoholics. It is said on the street "if you don't make it out of City Team Ministries, then your next step is a pine box." Bubba pulled up in the food line and started handing turkeys out. He stayed a long time, helped unload the turkeys, and then talked with each person who came by with deep compassion. He never spoke down to anyone, but rather he encouraged them. He spoke words of hope, life and freedom from a perspective that was inspiring. Everyone went home that day aspiring to be a better person, including me. Bubba is just that kind of guy.

Bubba knew 22 children who were headed in the wrong direction, and talked with me about how we might help them. These children were in trouble in school, involved in gangs, and all of them had difficult home situations. They lacked hope, direction and a vision of the future. Together, we started a club for these children called "The New Generation". It was a new generation of children, a new generation of people, and it gave them a new generation of life. He gave them uniforms; he gave them opportunities; he gave them a place to come and talk; the place was Bubba's home. Bubba had 6 children and a wife, yet he openly extended the protection and provision of his home to 22 children who desperately needed help and had nothing to give in return. He provided them a safe haven, a place to hang out that was free from danger, and inspired them to a new life. He shared his experiences in business, in life, as a football star, as a husband, as a man, and as a friend. The great tragedy for us is

that 4 of those children turned back to gangs, drugs and a lifestyle that ended in an early death. However, 18 were saved. Today all 18 children now have meaningful jobs, deep family connections, and are all inspiring others and giving back to the community as a result of Bubba Paris' amazing generosity of time, money and his life. The stories go on and on, and I'd be happy to share those stories with you at any time.

I'll share the holiday dinner experience that Bubba decided just once during the year, the homeless of San Jose would enjoy a sit down dinner for all that could come to a restaurant downtown, not paper plates and a food line but a person serving with china, silverware a complete holiday dinner. A lot of preparation goes into to serving 1100 homeless people dinners, buying all the food, cooking 100 turkeys, all the fixings, volunteer's, and transportation! . He got 1100 all day bus/train passes, attached to flyers and distributed to all the homeless shelters, with directions to ensure there was no one turned down. Bubba knew we together we could give 1100 homeless people at least one day where they had dignity.

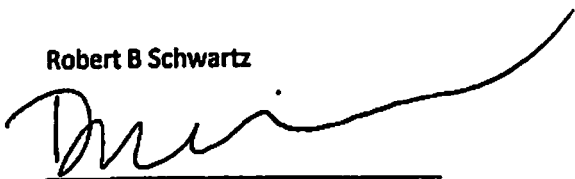
I hope this letter of recommendation serves as a glimpse into my heart and, more importantly, into the huge heart of Bubba Paris. We need more people like Bubba Paris in our country. We need heroes who wear the cape of success and courage to help build up the youth of this country. We need more people who act with the moral ethics and values to teach our kids to envision a future that is brighter. Bubba is a leader, a hero, a great man; I'm proud to call him my friend!

Please do all possible to assist Bubba Paris in the days ahead, and if I can be of any service to you in this journey, please know the answer is "YES" even before you ask.

I am proud to know him, to call him friend, and I am a better person because of Bubba.

Sincerely,

Robert B Schwartz



**riverbed**

**Think fast.**

**Bob Schwartz**  
Global Account Director-HP  
Riverbed Technology  
408-483-3436  
Email: [bob.schwartz@riverbed.com](mailto:bob.schwartz@riverbed.com)  
[www.riverbed.com](http://www.riverbed.com)

# **EXHIBIT 20**

To Whom It May Concern:

August 20, 2013

There are many reasons why people are drawn to each other. For the purpose of this effort it is important to focus on the reason William "Bubba" Paris and I were drawn to each other. The reason is to help others, plain and simple; with no additional weight or pressures, simply to give love to those that are less fortunate.

My name is Dennis Costanza, I am President of Community Youth Center (CYC) (over 11 years), CYC is an organization that helps over 1500 underserved kids through sports, academics and a positive environment. I am also President of The Hofmann Family Foundation, and organization that dedicates much of its energies and resources to help educate young kids through its financial contributions.

I will take this opportunity to tell a story, the story of how I met Bubba, and why we became friends, and how we grew to respect each other. I am confident that this story, and the experiences it reflects will unconditionally support the decision to keep Bubba out of jail. Our world is a better place if William "Bubba" Paris is a free man.

Although knowing Bubba as a famous athlete, my first direct exposure to Bubba was as a spectator during one of his presentations to a youth football league. Bubba captivated the crowd, players, parents, coaches, anyone who was in ear shot, even the custodians at the facility where the event was held were gathered and fortunate to hear Bubba speak. He spoke of many things, but through all the messages he used to support his beliefs, it was apparent that his primary goal was to empower kids to be successful, and that success was a result of a good plan, and the confidence to execute to the plan. Simply wanting something was not good enough, putting the work in was the key to reaching their goals. I don't want to re-write Bubba's speech, only expose to you the passion in which it was delivered, and the unique and brilliant combination of intelligence, presentation, organization, commitment and love, executed perfectly to help kids. That day Bubba took the first step in our relationship, he gave love to others, and I was one of the lucky ones to receive it. Bubba drew me to him with his words.

Many years later I became involved in CYC, I needed someone that was famous and had the desire to help kids. I needed that person to personally witness what CYC had to offer kids, and to help me reach people I could not reach on my own. I needed that person to believe in me, and to help me expose CYC's offerings to others. I reached out to Bubba, I reached out many times, Bubba was a busy guy, he did not have a lot of time, but I kept calling, hoping to get him to CYC, over and over I tried. Finally Bubba agreed to stop by CYC on his way to another appointment, he said, "I have 15 minutes". I would take what I could get.

Bubba arrived at CYC, I knew his time was limited so we began walking, as we walked, I talked. Talked about CYC and what it stood for, its mission, who we help, how we help, etc. Bubba was listening, but not attentively, he was watching, watching CYC coach's coach kids, one on one, in small groups, paying attention to their every need. Bubba was realizing that CYC was giving love to kids, exactly what he does through his words, CYC executed physically, from one end of the center to the other, coach after coach, Judo, Wrestling, Taekwondo, Gymnastics, Rhythmic Gymnastics, Cheer, Dance, Conditioning, Boxing and finally Academic Tutoring. Without realizing it, Bubba was at CYC for over 2 hours, far beyond 15 minutes; somehow the CYC reached Bubba. The kids and coaches won him over. As Bubba was

completing his visit, we were exiting the center through the lobby, as we were leaving, a number of cheerleading students were entering the center. Bubba stopped them, began engaging in discussions, asking them about their experiences, asking them why they came to CYC, it was clear Bubba cared about kids and put them first. Within minutes Bubba had them lined up in the lobby and was teaching them a cheer, which he gracefully executed with them. What a site, a huge man in a small youth center lobby, doing a cheer with the students, entertaining the onlookers, building confidence, in just a few minutes. Imagine how many more times this type of giving occurs in Bubba's life. We need Bubba in this world, out there helping others, not in jail.

I am not saying Bubba did not do wrong, that is not for me to decide. If he did do wrong he should pay a price, but not the price of jail. Bubba is way more valuable to society out in society, not locked up. Bubba is not a criminal, he may have made an error, but he is not a bad person. Quite the opposite, he is an unbelievable person that unselfishly gives to others. Bubba went through a rough patch and got out of balance, not everything in Bubba's life at that time was perfect. I believe from the bottom of my heart that Bubba is remorseful for things that happened in his life at that time, but that is behind him and he is in balance now. Please enable Bubba to help others, keep him out of jail.

After Bubba toured CYC and became a believer in its mission, I called on him many times to help at CYC fundraising events, or with CYC kids at The Center. Bubba never turned me down, he never accepted a penny, Bubba did it because he loved kids and wanted to help. He wanted to give love unconditionally and try to change the lives of kids for the better. Bubba is a special person, Bubba believes in people. At this time I am asking you to believe in Bubba. One of the hardest things to do in life is forgive, someone that can forgive is strong, strong enough to overcome the failures in others and empower them to move past their failures and get back on track. Be strong enough to forgive Bubba, keep him out of jail and empower him to help others, give Bubba's true strengths the freedom they deserve.

Thank you for taking the time to read my letter on behalf of William "Bubba" Paris.

Sincerely,

Dennis Costanza

# **EXHIBIT 21**

To Whom It May Concern;

I am writing this letter in support of the work that Bubba Paris has provided in the past to our Association. As President of the Northern California/ Nevada Chapter of the National Association of Housing and Redevelopment Officials we enlisted the services of Mr. Paris at two conferences for speaking engagements. As a motivational speaker he was able to excite our attendees into looking at the world from a different perspective and was a "hit" at the conference. In fact his session was so engaging we invited him back the following year for a second conference at which he was the keynote speaker during the luncheon.

Mr. Paris' message was topical, to the point and very enlightening and I would recommend him as a must have speaker. After his sessions Mr. Paris took the time to meet and talk with attendees and distinguished himself as a man of humility, character and integrity. Our Association could only provide the highest marks for Mr. Paris in the two years that he provided services for us.

I am available to provide any additional information as may be necessary regarding Mr. Paris and the association with our Chapter and can be reached at (559) 674-5695 ext. 223 or by e-mail at don@maderaha.org.

Sincerely;

Donald Borgwardt  
Executive Director

The National Association of Housing and Redevelopment Officials (NAHRO) is a professional membership organization comprised of approximately 23,000 housing and community development agencies and officials throughout the United States who administer a variety of affordable housing and community development programs at the local level.



# **EXHIBIT 22**

August 30, 2013

To Whom It May Concern:

I have had the pleasure of knowing Mr. William "Bubba" Parish for over 10 years. During the years of our acquaintance, I have known Bubba in several capacities, such as a professional, a motivational speaker, a friend, a confidante and a brother in Christ.

Bubba's professionalism as a truthful, trustworthy, reliable, honest person makes him a great commodity. I have had him to serve as a motivational speaker for the San Francisco Federal Executive Board, Equal Employment Opportunity Council training and at our annual QUAD conferences, in which I served as the Council Chair. His caring for people makes him a useful resource. Bubba, isn't territorial per se, he is about letting go of ego, and bringing his spirit to task and being his best and most authentic self.

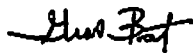
Bubba's care for people from all walks of life was a great asset to my job in civil rights at the Forest Service. Bubba is a person who is less concerned with pep talk and more concerned with creating a place in which people can do good work, can find meaning in their work, and can bring their spirits to work, cause or task. So, I solicited him as our motivational speaker for my annual training of our equal employment officers from the eighteen (18) national forests in California.

Bubba's is a dedicated and committed associate minister. Bubba was called on by my church to be the guest speaker at our annual Career & Scholarship banquet. He maintains an active position of leadership within his church; he is responsible for enhancing and maintaining many ministries within God's kingdom; and he has a present for people and builds a community of people whom he comes in contact with.

Furthermore, Bubba is of good reputation (i.e., steadfast, upright, exceedingly cherished). He has a good sense of humor, is a good communicator, with the young as well as the elderly.

I could go on with descriptions of Bubba's many other good qualities-his work ethics, his energy, and his sensitivity to name a few. I would simply like to say how much I think of Bubba and how pleased I am to recognize him as a strong role model too many and to be called one of his friends.

Sincerely,



Gwen Bryant  
USDA Forest Service  
Civil Rights Staff  
Equal Employment Manager  
(510) 207-5181 (cell)  
(707) 562-8730 (work)

# **EXHIBIT 23**

**August 28, 2013**

**To Whom It May Concern:**

**Re: William Paris**

I originally met William "Bubba" Paris in the late 1980s where he appeared as a keynote speaker at a community event in Woodland, Ca. He was upstaged by a surprise appearance by Muhammad Ali, yet he impressed me with his humor, thoughtfulness and humility. Since then, he has come to Vallejo several times to assist me in serving as a guest speaker or Master of Ceremony at community programs or events that I produced or directed. Bubba has shown that he is a person who is intelligent, quick on his feet, humorous, kind, honest, and loyal.

Over the years, I am proud to now consider him a friend.

Please feel free to contact me for any additional comments or information.

Yours truly,

**Pamela Pitts  
Former Vice Mayor, City of Vallejo, Ca.  
55 Springstowne Ctr. #255, Vallejo, Ca. 94591  
(707) 552-2661**

# **EXHIBIT 24**

**To Whom It May Concern:**

**I have known William Bubba Paris for over 20 years. I first employed Bubba as a motivational speaker in 1989. I held the position as General Manager of IBM'S Silicon Valley Laboratory in charge of 2400 Software Engineers. I was drawn to Bubba because of his reputation as an outstanding leader known for his work ethic.**

**He gave several motivational sessions to our employees all of which were rated outstanding by the attendees. Ever since then I have closely followed Bubba's career as he moved from his career as a professional football player to a media personality. I've always been proud to provide a reference for him. He is truly a role model**

**Yours Truly**

**Thomas Furey**

# **EXHIBIT 25**



**DOUG BALATTI**  
ASSISTANT CHIEF

BUREAU OF AUTOMOTIVE REPAIR  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA

10949 North Mather Boulevard  
Rancho Cordova, CA 95670

Phone: (916) 403-3470  
Fax: (916) 464-3424  
Douglas.Balatti@dca.ca.gov

To Whom It May Concern,

Bubba Paris has been a close personal friend of mine & my family's since 1987. Throughout these past 26 years I have known Bubba to be a wonderful Father and a model citizen. He is one of the most giving & generous individuals I have ever known. He has been an inspiration, role model and mentor for my children, my Brother's children and thousands of young people.

Bubba has always found time to get involved in life around him. Whenever he has adopted a cause or pursued a new interest he is guaranteed to be highly committed. I have attended many charitable events in which Bubba was the keynote speaker. He continually volunteers his time in assisting the under privileged and troubled youth within our society and he has worked diligently in this effort.

By example, Bubba has taught me ( & many others) not only the value of making time to help others, but also the importance of loyalty and commitment. He has devoted his life to making society a better place and I have no doubt he will continue to do so . We only need more "Bubba's" in our world.

Sincerely,

A handwritten signature in black ink that reads "Doug Balatti".

Doug Balatti

Assist. Chief  
Bureau of Automotive Repair  
State of California  
10949 North Mather Blvd  
Rancho Cordova, CA  
95670



# **EXHIBIT 26**

**IMPACT BIBLE MINISTRIES**

**1638 FAIRGROUNDS DR.**

**VALLEJO, CA. 94589**

To whom it may concern,

This letter is concerning a person that I would consider a friend, but more so an exceptional person when it comes to motivation, sharing of his gifts and willingness to encourage young people to make better life choices. That person is indeed Mr. William "Bubba" Paris.

In fact, as we have sponsored our "Boyz to Men" conferences, Mr. Paris has given of himself, his time, his public speaking ability, and even created personal space with many of the young men, who continue to be inspired by his participation.

Mr. Paris, even with his celebrity status, is indeed a genuinely altruistic person who loves to give of himself. There is so much more I could say about him, including his humor, and great personality. Actually, there has not been a time that he has not made himself available when we needed him to assist us with young people or those in need, unless there were extreme circumstances that prevented it.

Therefore, it gives me great pleasure in writing this letter of character reference on behalf of Mr. Paris. If there is anything that I can do to further assist in this process, on his behalf, please to not hesitate ask.

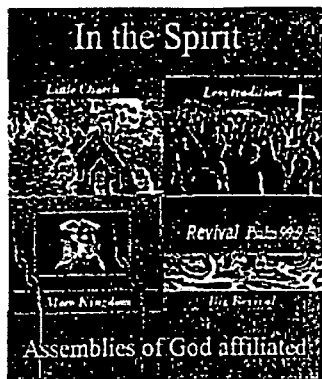
Sincerely,



Pastor Anthony Summers

Senior Pastor-Impact Church-Vallejo

# **EXHIBIT 27**



## Good News Fellowship Church

Date: August 30, 2013  
To: Cynthia Paris  
From: Pastor Chris C. Vinculado  
RE: William Paris Character Reference Letter

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126 Los Olivos Avenue  
Daly City, CA 94014

Senior Pastor / President:  
*Chris C. Vinculado*

Administrator:  
*Vickie Matos*

Church Board Members:  
*Albert Boado*  
*Monika Capehart*  
*Madalene Cordero*  
*Vickie Matos*  
*Sally Suarez*

Phone:  
650-756-7476

Fax:  
650-756-4651

email:  
gnfellow@yahoo.com

My name is Pastor Chris Vinculado and I am Senior Pastor of Good News Fellowship in Daly City, CA. I met William "Bubba" Paris in January of 2012.

Upon our first discussion when we met, I told him that I knew him as a 49er player, but I knew him also as a man who believed in our Lord as well. After a rather lengthy discussion, I asked if he ever spoke at different churches and would he consider speaking to my congregation some time. Without hesitation, he replied with a resounding, "Yes, of course I would come and speak to them. Everyone needs some encouragement and hope in their lives."

It is not in my nature to ask everyone that I meet, whether celebrity or not, if they can come and speak to my congregation. As for William though, my spirit felt a kinship about him that he was speaking from his heart and not his mouth only. With this in mind I had no doubt or fear of his integrity and love for people who are in need of faith, hope and love.

He did come and speak to Good News Fellowship Church on the Sunday after our conversation and he did offer faith, hope and love to the congregation that Sunday visit. He inspired many not to give up in their personal situation in life and gave them encouragement!

Since that first visit, we have met William, Cynthia, and Trent several more times, and William came back to Good News Fellowship in March of this year and offered our congregation three consecutive days of ministry. Not once did he ever ask for a donation or fee for his time!

He is a very humble and gracious man and preached to our congregation expecting nothing in return. William, Cynthia, Trent and anyone else in his family are always welcomed at our church.

If you have any further questions or concerns, please feel free to contact me at 650-238-4422 (cell) or 650-756-7476 (church office).

Sincerely in Christ,

Reverend Chris C. Vinculado  
Senior Pastor

Web Sites: [goodnewsfellowship.net](http://goodnewsfellowship.net) - [dalycitycelebraterecovery.com](http://dalycitycelebraterecovery.com)

# **EXHIBIT 28**

# IMPACT

ACCOUNTABILITY PROGRAM

## BOARD OF DIRECTORS

Chief Executive Officer  
 Chaplain Earl A. Smith, Sr.  
 Chief Operating Officer  
 A. Leonard Neal  
 President  
 Rev. Johnny B. Stein  
 Vice President  
 Richard K. Kemp, Sr.  
 Secretary  
 Betty Jo Smith, Esq.  
 Treasurer  
 Miguel Dwin  
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 Bishop Donald E. Green  
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 Edward Ramirez  
 Sterling B. Scott  
 Administrative Assistant  
 Angel M. Smith

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 Tony Corron  
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 Charles Skeaton  
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 Patrick Perabo  
 Edward Ramirez  
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 Stanislaus County  
 Ira Whitson  
 Southern California  
 Yvette Abreo  
 Arbyl Bryant  
 Louis Garcia  
 Jason Gottlieb  
 Kevin Hagan  
 Jose Martinez  
 Xochitl Panchuro  
 Ron Vaca

## PRISON DIRECTORS

Willie Bryant  
 Miguel Dwin  
 Albert Featherstone  
 Daryl Jenkins

August 23, 2013

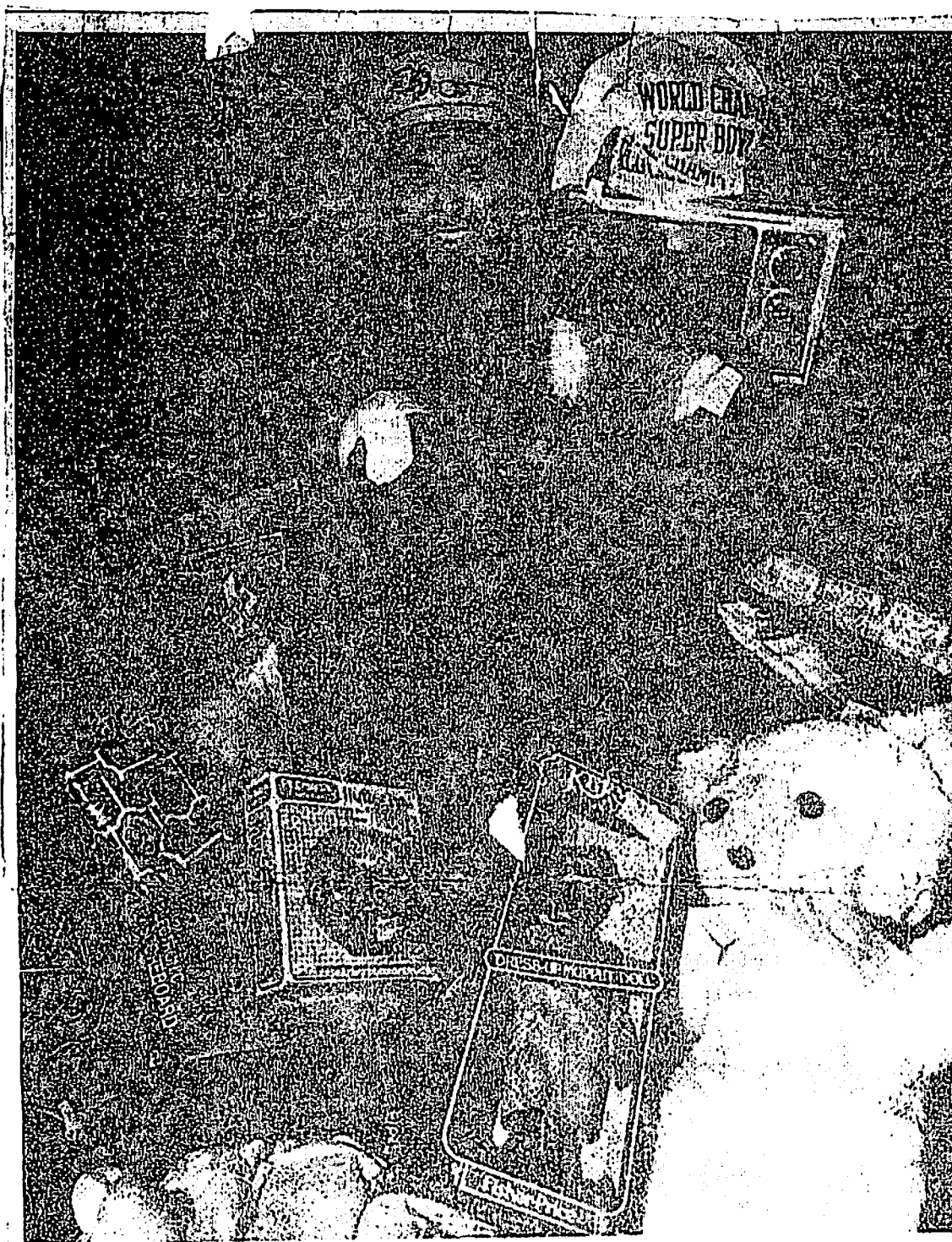
Re: William Paris

To Whom It May Concern:

- I have known and worked with Mr. Paris for over 25 years. I have always known Mr. Paris to be a man of character and principle. When Mr. Paris made me aware of his current legal situation, my first reaction was that his action was out of character.
- Certainly, his heart and his deeds and actions since the instant offense have shown a remorseful and contrite spirit.
- It is my understanding that there are discussions about sending Mr. Paris to jail or prison for his lapse in judgment. I feel that justice would require amends, not an act of momentary indiscretion. I say this based on my 24 years as a Protestant Chaplain at California State Prison, San Quentin. Over my years working in that capacity, yearly, Mr. Paris would volunteer to minister to the men and for a number of years he offered his services to the families of the inmates as well. Mr. Paris has served as a platform guest for prison ministry services throughout the United States, each time he applies to enter a facility, a background check is done, to my knowledge, Mr. Paris has never had an arrest, and I am aware of only one traffic infraction.
- I have worked with men doing life-term sentences and men condemned to death; I have worked with men sentenced to 16-months for first time offenses and men given life without parole terms, I guess you could say I have seen all levels of offense and offenders. Therefore, when I say that prison or jail would not serve the community well nor would the time in any way bring about a change the overall person of Mr. Paris, I say this from the perspective of someone who has worked in and studied the criminal justice system. I know first hand the need for our current penal system, and I know that from time to time, people have temporary lapses in judgment, which if given the opportunity for restitution away from a penal facility have proven the trust of the judicial system to be well placed.
- When the word "incarceration" is mentioned, many times we think of a person doing time in a man-made facility. I tend to think that the housing someone in a man-made facility is simply detention and comes as a byproduct of "incarceration". If a goal of detention is to "rehabilitate", then I think that goal has been reached in advance of Mr. Paris being detained. To be rehabilitated means to change one back to his/her former state. From the time this issued occurred and was brought forward, Mr. Paris has attempted to make amends for his obvious lapse in judgment.
- I am asking for your favorable disposition of this case in the affirmative of not sentencing Mr. Paris to detainment.
- Chaplain Earl A. Smith, Sr.  
 Retired Chaplain, CSP-San Quentin  
 Chief Executive Officer  
 Incarcerated Men Putting Away Childish Things

# **EXHIBIT 29**





# Bubba

# Claus

## 49er rookie tackles his biggest role

By Frank Cooney  
Examiner staff writer

**H**E HAD a broad face and a little round belly, that shook when he laughed, like a bowl full of jelly.

He's the 49ers' version of St. Nick — Bubba Claus.

That's the role 49er rookie tackle William "Bubba" Paris will play today for 10 families, including 33 children.

He has spent the past week finding presents, food and clothes to give to families who might not otherwise celebrate the holiday.

"Merchants from all over the Peninsula have chipped in a lot of nice things and the Salvation Army knew of 10 families from around the Bay Area who were especially needy," Paris explained.

Today the families gathered at the Salvation Army in Oakland to have Christmas Eve with Bubba Claus.

This was an idea that came to him suddenly while he was sitting in his Peninsula home, recalling his own childhood Christmases.

"I was watching on TV and saw where one child they called 'Baby Holly' was abandoned because her mother wanted her to have a good Christmas and she couldn't provide it," Paris said.

"Then I heard a letter to Santa from a mother, telling of how she wanted to give her children a good Christmas but couldn't."

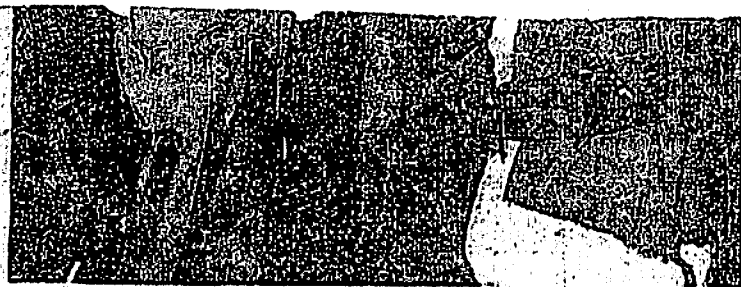
Paris remembered how he loved Christmas time when he was growing up in the projects of Louisville. Nice Christmases, he said, because the house

Examiner: Kurt Rogers

Bubba Claus Paris is surrounded by some of toys he collected to give away to needy kids in the Bay Area

—See Page D2, col. 1





Examiner/Kurt Rogers

Bill Walsh opens package from Santa (DeBartolo) Claus, a 7-foot Oriental screen

## 'Bubba Claus' turns poetic over meaning of Christmas

—From Page F1

was filled with love even if there weren't a lot of material things.

"My mother always made Christmas special because our home was warm with love," he said.

Paris has since acquired a few material things, thanks to the contract that goes along with being a first-round draft choice.

"I'm grateful for what I have had in life, like the love of my family," he said. "And now I am fortunate enough to have a nice home of my own."

"But that abandoned child and that note from the mother made me want to share my good fortune with others. I would like all children to have a warm, loving Christmas."

One special child in particular, William H. Paris III, will spend his first Christmas with Bubba Claus.

"My son is here visiting from Michigan, just for Christmas," Paris said proudly. "He is 7 months old and it feels good to have him here now because Christmas is so special."

And today Bubba Claus will meet his 35 other Christmas children.

"They range from 6 months to 16 years and we've arranged the presents so each family will receive what it needs, whether it be baby food or whatever," Paris explained.

Paris has had the time to accomplish all his Christmas work because he has not been playing football since he underwent knee surgery in pre-season.

Although the operation was a serious one, as knees go, he went through the experience with his usual good humor.

"You can't just sit around worrying about yourself and your problems," he said. "I've written a poem that tells about my feelings on that and maybe it's appropriate for this time of year."

With that, Bubba Claus spontaneously launched into an animated presentation of a poem he calls "Hall of Confusion":

Life is cold, life is warm  
Life hurts, life helps  
Life is walking in darkness  
And saying the lie

## 49ers visit children at Stanford hospital

The 49ers took time out from their preparation for Sunday's visit to Kansas City to celebrate Christmas with children at Stanford's hospital.

They stopped there yesterday on the way to practice at Stanford and shared time and presents with the excited youngsters.

Despite the 49ers' slightly unSuper 25 record, even the Scroogiest of players seems to be smitten with at least some Christmas spirit.

Linebacker Jack "Bah-Humbug" Reynolds not only enjoyed the stop at Stanford, but even decorated his desk with something other than X's and O's for a change.

"He asked me to decorate his little plant like a Christmas tree," revealed an office elf, pointing to the one-foot high evergreen on the desk. "He looked at the ribbons and ornaments and smiled just like a kid looking at a Christmas tree."

Team owner Eddie DeBartolo Jr. also showed the Christmas spirit of giving in a typically dramatic production last night.

Three big trucks from a major department store, accompanied by a mock trolley car full of carolers, made stops at the 49ers' offices and homes of office workers.

The truck drivers, dressed in Santa outfits, delivered presents from the DeBartolo family as the carolers filled the chilly air with music.

— Frank Cooney

Everyone claims he is the exception

Don Shula, coach of the Miami Dolphins  
A low shovel. It might help get rid of  
nightmares stemming from seeing a prison

asn't already earned it.  
The Edmonton Eskimos  
in consecutive Canadian Foot

## Longhorns' big win

Examiner news services

Kelvin Bryant came out of the blocks so fast in 1981 he seemed likely to make mere mortals of the likes of Herschel Walker and Marcus Allen.

Bryant's accomplishments since that incredible start a year ago in which he rushed for 520 yards and scored 15 touchdowns in North Carolina's first three games haven't been exactly shabby, but anything would pale by comparison.

First came a knee injury in the first quarter of the fourth contest that sidelined him for four games and limited him to 13 carries in his return. But Bryant closed out the 1981 regular season with games of 171 and a career-high 247 — 1,015 for the year — and reeled off 148 more in the Gator Bowl against Arkansas.

This year, the 6-foot-2, 195-pound senior rushed for 1,064 yards and became the third player in Atlantic Coast Conference history to record three 1,000-yard seasons — he had 1,009 while splitting time with current 49er Famous Amos Lawrence in 1980 — despite being hampered by a sore ankle that he sprained before the season and reinjured in the first quarter of the second game.

Bryant will be one of North Carolina's prime offensive weapons when the Tar Heels, 7-4, meet eighth-ranked Texas, 9-2, in the Sun Bowl in El Paso, Texas tomorrow.

The game, nationally televised by CBS starting

## College bowls

at noon PST, is one of three games tomorrow. In the others, No. 16 Maryland in the Pacific in Honolulu and top players in country will meet in the annual in Montgomery, Ala.

After sitting out one contest at 14 times for 55 yards when he car reeled off six outings of 107 ya Carolina's final seven games, ac yards in that stretch. His per-100.4 was 11th in the nation.

But just like a year ago, Bryant back seat to Walker, et al.

"I guess I wasn't 100 percent fifth game of the year," says Bryant career tomorrow. That was enough as one of the favorites in Trophy race.

"The Helmsman was always in my mind," Bryant concedes. "But if much about that, I wouldn't do it to do to help the team."

The Aloha Bowl features the profile kicker in Washington's

## 'Heart attack' false alarm

Examiner news services

Tony Dorsett's older brother died of a heart attack at age of 27, and the Dallas Cowboys running back said "it scared the hell out of me" when he awoke early yesterday morning with chest pains.

"My mind started thinking crazy things. I was thinking about all kinds of things. I had my wife call the emergency room at the hospital. I told her something was wrong with my heart. I thought I was having a heart attack," Dorsett said later in the day.

Doctors at Plano General Hospital in a suburb north of Dallas were waiting when Dorsett's wife, Julie, drove up with him about 2 a.m. yesterday. They examined him and sent him home about 4 a.m. after diagnosing his problem as muscle spasms from his chest.

Dorsett, 24, had been having back pains since the Houston game two weeks ago, when defensive back Greg Stenmark speared him.

Dorsett said the pains in his chest Wednesday night were "severe" and prevented him from sleeping.

He attended team meetings yesterday but did not work out. He is still listed as "probable" for Sunday's game with Philadelphia.

The Cowboys also said middle linebacker Bob

## NFL roundup

Bruenig, who has a bruised thigh, ed from probable to questionable game.

Cardinals' Roger Wehrli, the St. Louis secondary defender, announced yesterday he would end of the current season.

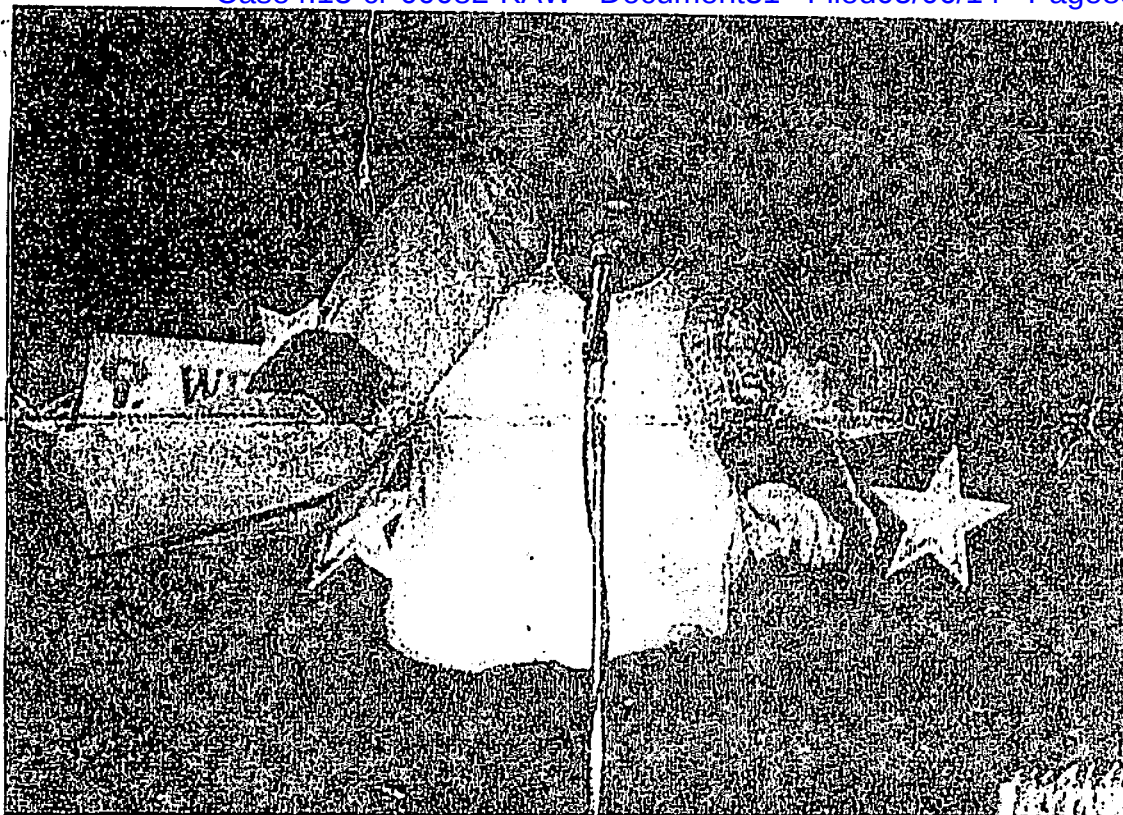
"It's a hard decision to make," a seven-time Pro Bowl performer. "I had 14 good years with the Cardinals, and I want to be someone who was contributing."

St. Louis coach Jim Hanifan career, which was highlighted University of Missouri standout's NFL's "team of the decade" for.

"He epitomizes the word 'clay player' but as a man," Hanifan said career, he has to be regarded as a cornerbacks in the history of the Saints.

Quarterback Kenny Stabler, back George Rogers are list for Sunday's contest against the Redskins. Rogers pulled a hamstring Wednesday, while Stabler was

# **EXHIBIT 30**



PHOTOS: SUSAN GARRISON/STAFF

Carry that weight: Bubba Paris gave Taft Elementary School teacher John Glover a lift while he spoke to students last week.

# Bubba's pitch to kids

BY RON L. COVENSON  
Correspondent

When Bubba Paris, the former San Francisco 49ers' offensive lineman, walked into Taft Elementary School last Tuesday, the only things bigger than Bubba were the smiles on about 300 cheering students.

Looking like Gulliver standing among the Lilliputians, Paris, who was asked to speak to the kids by Taft Principal Jean Anthony, spent the better half of an hour joking and having fun with teachers and students.

He cleverly turned the fact that he was 20 minutes late for the presentation into an object lesson about the importance of staying in school.

"I made the mistake of trying to get here (to the school) without a map and I got lost," Paris said. "School is like a map."

See BUDDA, page 7A



PHOTOS: SUSAN GARRISON/STAFF

Setting goals: Taft students listen as the former football star encourages them to make firm plans and not to give up on them.

for Today's Inserts:

Safeway and Cala/Bell

# BUBBA: Ex-Niner tells kids not to give up

Continued from 1A

to your future. You will need it in order to get the directions required to be ready for life."

## Goals fulfill dreams

In between his exchanges with students, Paris offered sage advice on the importance of goal-setting and hard work.

"When I played high school football, I set a goal to become better each year," Paris said. "Later, I set a goal to play college football and when I was in college, I set a goal to play professional football, and I can say today that I accomplished all my goals in football."

"If you don't set goals, kids, you won't ever achieve your dreams — it's as simple as that," Paris said.

Anthony said she was looking for someone who could both inspire the children and interact with them in a way that would "keep them engaged in the topic."

"We have children from a variety of backgrounds here and I thought it would be a good idea to bring someone in that they could all identify with. Someone who would be able to really reach them," she said.

"Bubba has a special way of handling students and he really knows how to interact with them," she said. "We were really pleased to have him and I think the students really enjoyed his presentation."

Paris — who joked about outlasting former 49ers' coach Bill Walsh — interacted with the students in an impromptu

manner, allowing them to share their thoughts and questions.

## Emphasizing self-esteem

At one point, Paris escorted two students on stage, one of whom he referred to as "little Bubba," and the other as the "handsome, skinny kid." The usually jovial Paris shifted into a more serious tone as he talked about self-esteem and perseverance.

"In life, there will always be someone out there who will tell you that you can't accomplish something just because you're too fat or too skinny, or because of your color, or because you are a girl," Paris said.

"During those times, you need to remember the words of Eleanor Roosevelt, who said during the Depression, when

everyone was having tough times, that 'no one can make you feel inferior unless you let them.'"

After encouraging the kids to repeat the statement, "I don't just think I'm somebody, I am somebody," Paris closed the session by reminding the students that the word "quit" should not be a part of their vocabulary.

"When you fail at something, you should look at it as an opportunity to learn something," he said. "When you use what you learned through failure, then you really win."

"A great man by the name of Winston Churchill once said that we should 'never, never, never give up.' And if you never give up, then the sky is the limit in (terms of) what you can accomplish."



# **EXHIBIT 31**

CELEBRATING YOU

# jetty diving

magazine

*Sky Diving  
Feel the  
rush*



**Will Durst**

**Delta's Farmers  
Market**

**Jim Frazier**

# Channeling History: but will it make money?!

By Walter Ruehlig  
walter.ruehlig@gmail.com

Editor Charleen Earley sent me a picture of a 'new' TV she bought at a thrift shop and, though inartful, circa 50's Americana furniture, I felt myself awed. This veritable shrine had transformed America's household rituals, manners, morals and mores.

In 1937, RCA envisioned TV's incredible promise, hiring Russian scientist Vladimir Zworykin and investing \$50 million research dollars to perfect John Baird's primitive prototype built 10 years earlier. WWII slowed progress, but at conflict's end war-related technical advances, increased leisure time, rising disposable incomes and the first manufactured sets under \$200.00 intersected.

Ownership exploded from 5% of households in 1946 to over 50% by 1955. No other invention had entered homes faster. Remarkably, TV's now an annual \$60 billion dollar business.

The medium became the message as TV usage grew to an average seven hours daily, playing baby sitter and oracle. Today's popular shows, news or sportscasts invariably defined tomorrow's water cooler chitchat. Newborn protagonist and great levelizer, TV



TV purchased at Make Me An Offer, located at 3510 Main St., Oakley, CA, (925) 679-8138 or makemeanoffer43@gmail.com

homogenized a heterogeneous population, connecting urban and rural mindsets.

It helped derail McCarthyism, fuel the Civil Rights movement, and abort the Vietnam War. Tellingly, after Walter Cronkite branded the Viet Nam conflict a "stalemate," LBJ lamented, "If we've lost Cronkite, we've lost America."

The 50's heralded the Golden Age of Television, hosting superb original theatre like *Marty*, *Twelve Angry Men* and *Days of Wine*

and *Roses*. Vaudeville stars Milton Berle, Sid Caesar, Jack Benny and Jackie Gleason played live. Forget canned laughter.

Television broadcast simpler days with three major networks, car companies, breads. On 'I Love Lucy' or Ed Sullivan nights you knew what your neighbors and the nation were doing.

With lightning rapidity, TV's flickering blue glow eclipsed our living rooms, casting a spell over the American cultural landscape. It

became, in the words of Douglas Brinkley, "our meeting hall, the cathedral, the corner bar, and the town square."

As radio had become the new print, TV became radio with eyes. What soothsayer could have predicted that the innocuous looking box sporting 'rabbit ears' held a genie secreting seismic societal shifts?

We turned a knob simply seeking escape and, eureka, channeled history.

And that's the way it was.



*Words from Bubba ...*

## Protect your gift!

You must protect your gift even in the face of adversity. Adversity can come to you or because of you. There must be a dedication on your part to declare that this thing that I have been given, I will give despite my circumstances. If it was given to me, I will give it back to the world. I must be faithful to the calling of my purpose. You are the facilitator of your purpose. It is in you and it is

you. You must navigate through the obstacles of life and remember that you were chosen. You have been chosen to give the world that thing that only you can give.

In this dedication to your purpose, despite your circumstance, God knows he made the right choice in you.

*-William Bubba Paris*

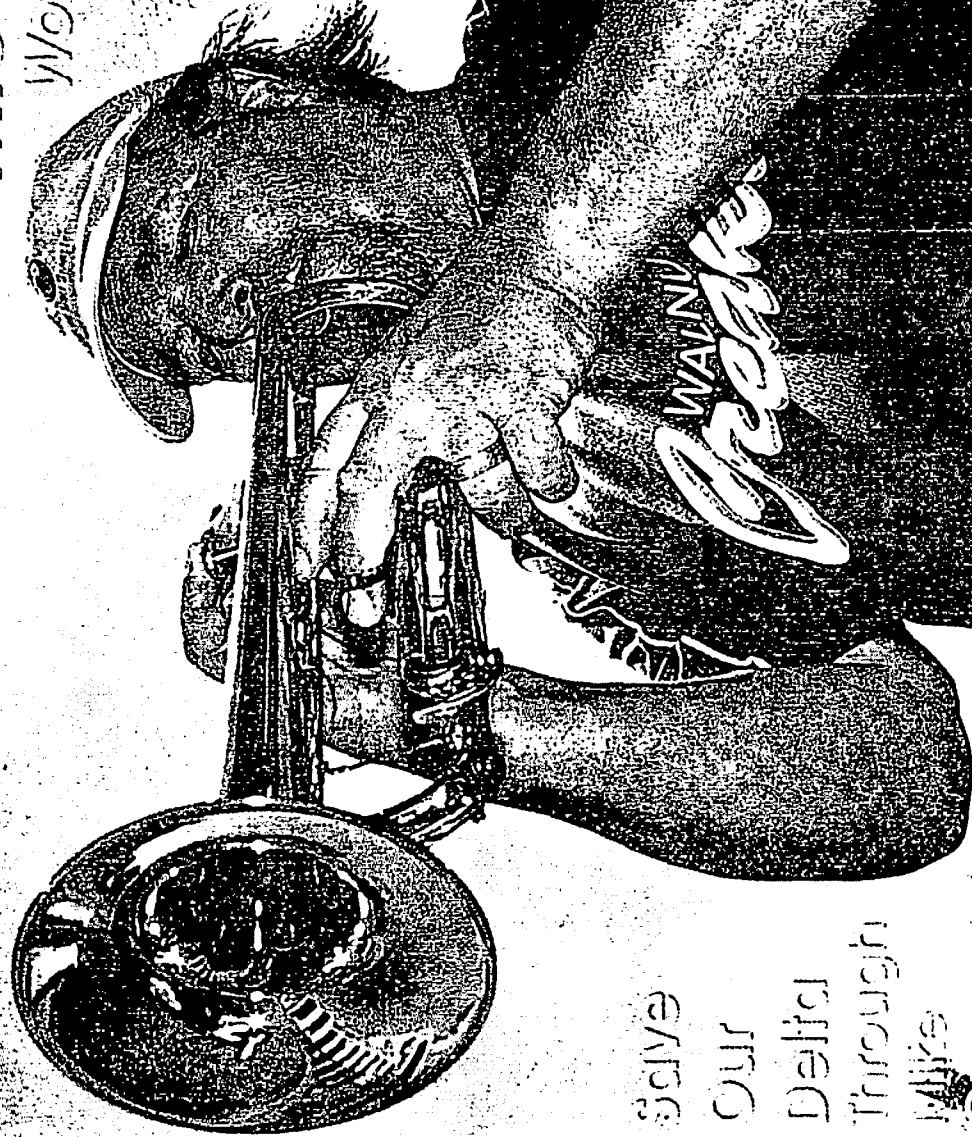
CELEBRATING YOU

# delta living

magazine

Case4:13-cr-00082-KAW Document31 Filed05/06/14 Page88 of 103

Mic Gillette  
World Renown  
America's  
Gross Plays



Save  
Our  
Delta  
Through  
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Eyes  
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Jennifer Jost  
Tragedy into  
Triumph  
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CASA  
A Voice for  
Abused  
Children  
8

July - September 2011



## Words from Bubba ...

We are born perfect for our purpose



We are the pure potential for what we are born to do. We are a natural. Our nature is purposed and precise. We are made perfect in every way to fulfill our purpose. It is in our nature to succeed. The things that are the most natural to us, the ones that we can't change, even if we wanted to, are all

needed to realize our true purpose. It's in the nature of an eagle to fly and in a shark to swim. Your purpose is found in what is most natural to you.

The thoughts in our head and the moving of our heart are the voice of our purpose and we are empowered by our nature. Every creation no matter how great or small once lived in the heart and mind of someone who was empowered by the force of their nature. We have all been given a piece of creation's puzzle. We have a purpose. The world is not complete without you. Discover your purpose and fulfill it. So trust the God in you. The world is depending on you.

-William Bubba Paris

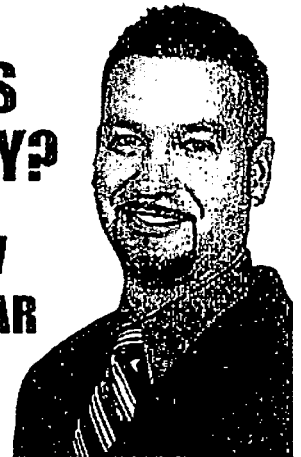
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**Orietta Gianjorio**

**Teaches**  
*Healthy*  
*Relationships*  
*with Food*

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October - December 2013



# Words from Bubba ...



## Awaken the leader inside

By William "Bubba" Paris

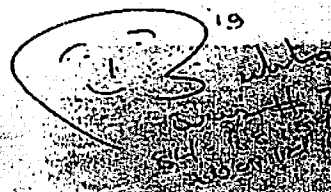
A leader must fully understand the actual moment. There must be a continuous awareness of all known and anticipated forces that are driving and shaping the moment. You can't allow yourself to be lured into seeing the past as the present. Two pictures taken of the same person two weeks apart don't reflect the same moment. Past results can give you the confidence in your ability to respond, but your response must be shaped by the variance of this moment. Deepak Chopra says in his book *Seven Spiritual Laws of Success*, "You can never dip your foot in the same river twice." The moment is ever flowing and changing, it's alive and influenced by life.

I give a speech to leaders called, "Leaders Have Responsibility," or Respons-iblity. Leaders have the ability to respond. We expect our leaders, when faced with difficult moments, to recognize the problem, diagnose it, create a plan of attack and implement that plan successfully. I am shocked to hear complaints from so many

people who are in leadership. They complain about the economy. They complain about the lack of new ideas or innovations. They complain about having a non-motivated workforce or rank-and-file. They seem to complain about everything that as a leader, they should have control of!

Frank Ganz, my special team coach with the Detroit Lions said, "Success is achieved when your family, your profession and your community feels the impact of your demeanor." So success is measured by the effect you have on the things you decide to do. The moment should feel the impact of your demeanor. A true leader is one who impacts the moment, and does not complain about the challenges associated with it.

[www.bubbaparis.org](http://www.bubbaparis.org)



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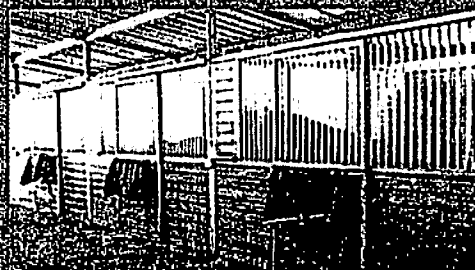
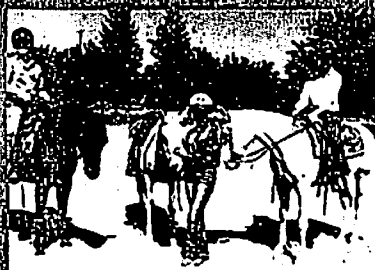
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*Louisville*  
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**Proclamation**

*Greetings to whom all these presents  
shall come, know ye that*

**May 19, 2013**

*is hereby proclaimed  
in Louisville, Kentucky to be*

**William "Bubba" Paris Day**

*and I urge all citizens to observe this  
special recognition.*



*Done in Louisville, Commonwealth  
of Kentucky, on this the nineteenth day  
of May, 2013.*

*Greg Fischer*

GREG E. FISCHER, MAYOR

# **EXHIBIT 32**



LIVE MUSIC ★ FOOD ★ RAFFLE PRIZES

**SATURDAY**

**FEBRUARY 23RD**

**10am - 3pm**

*In Celebration of Black History Month...*

2nd Annual

# Blood History Our History

## Blood Drive

at RTF Educators' Institute

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Grammy nominated  
Ra Walker



DJ/Reggae artist  
Zion Roots Sound



Blood donors get a:  
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*Magic show,  
arts & crafts and  
other fun activities  
for kids!*

**12pm - 3pm**

## Donate blood. Help save patients like Nivia.

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Visit [www.bloodheroes.com](http://www.bloodheroes.com), sponsor code HISTORY or call 415-354-1381 for your appointment.

• Bring a photo ID • Please EAT before donating • 16-year-olds need a permission slip signed by a parent/guardian



# The Squid List

San Francisco Bay Area Events

Advanced Search  
 Search Events by Keyword

/ Home / Calendar / 2nd Annual 'Blood History, Our History' Blood...

Attention: The Squid List will be shutting down soon.

See our blog post "[Saving Farewell To The Squid List](#)" for more info and other event resources.

The last date for submissions was September 15th.

The calendar and email list will be deactivated on October 31st.

<	Feb 2013 v1							>
S	M	T	W	T	F	S		
					01	02		
03	04	05	06	07	08	09		
10	11	12	13	14	15	16		
17	18	19	20	21	22	23		
24	25	26	27	28				

## 2nd Annual 'Blood History, Our History' Blood Drive and Celebration at RTF Educators' Institute

Saturday, 23 February, 2013 | 10:00 AM - 03:00 PM

Tweet 0 0  
 Share

Email to a Friend

In celebration of Black History Month in February, Blood Centers of the Pacific (BCP) is hosting its second annual "Blood History, Our History" blood drive to encourage at least 87 people to give blood on Saturday, February 23rd, from 10am to 3pm, near Oakland's Jack London Square area.

Calendar  
 Google Calendar  
 Yahoo! Calendar  
 Windows Live Calendar

All blood donors will receive a T-shirt plus an autographed photo and chance to meet motivational speaker and former San Francisco 49ers' tackle Bubba Paris. To add to the family fun and festivities, there will be free food, art workshops and a magic show for kids, as well as raffle prizes. There will also be live performances by Grammy-nominated producer/singer Ira Walker and Reggae artist Zion Roots Sound.

What: 2nd annual "Blood History, Our History" Blood Drive and Black History Month Celebration When: Saturday, February 23, 10am to 3pm Where: RTF Educators' Institute in Jack London Square, 525 4th St., Oakland

To schedule an appointment to donate blood, visit [www.bloodcenters.org](http://www.bloodcenters.org), click "donate blood" and enter sponsor code: HISTORY or call Fred McFadden at (415) 354-1381.

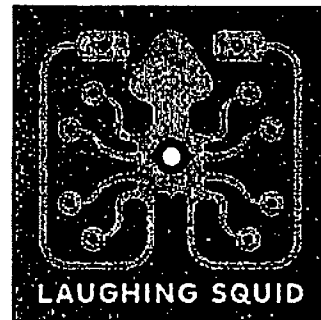
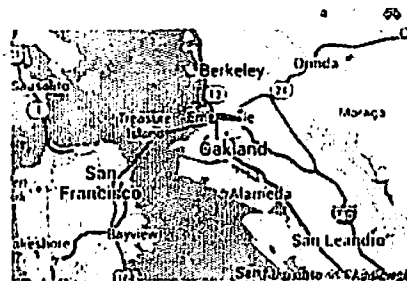
Cost  
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### Venue

RTF Educators' Institute  
 525 4th Street  
 Oakland, CA 94607  
 USA

### Event Contact

Fred McFadden  
 Email: [fmcfadden@bloodcenters.org](mailto:fmcfadden@bloodcenters.org)  
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[The History of The Squid List](#)

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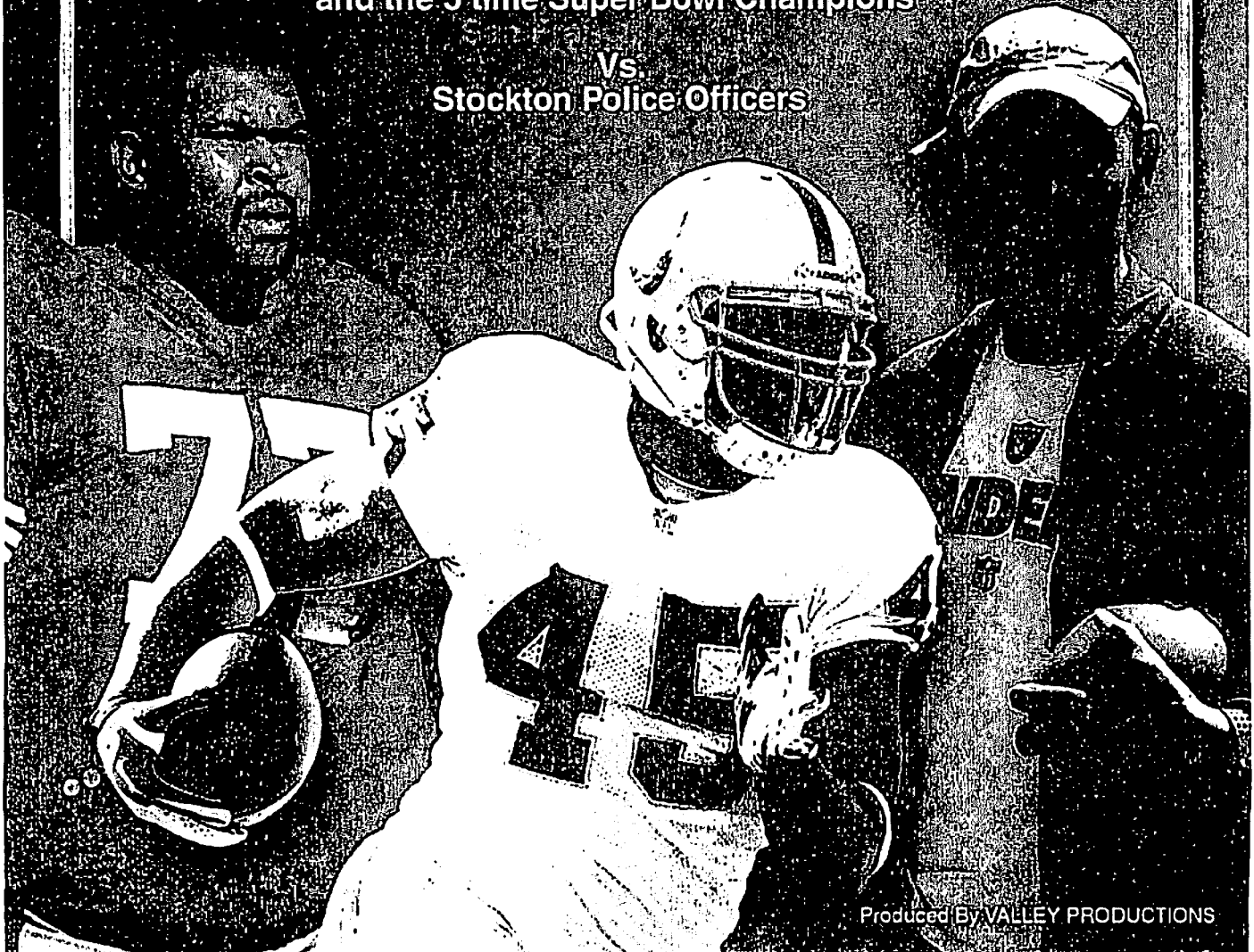
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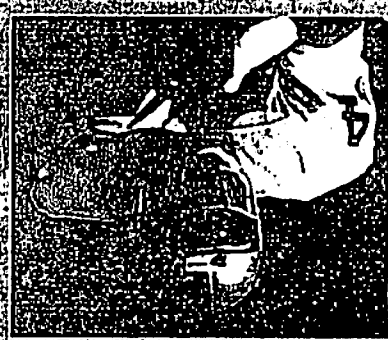
 

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# **EXHIBIT 33**



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**FEDERAL SENTENCING STATISTICAL ANALYSIS REPORT**  
*for*  
**WILLIAM PARIS**

**PREPARED BY**

Herbert J. Hoelter  
*Chief Executive Officer*  
and  
Meredith Patti, Esquire  
*Guidelines Research Specialist*

**January 22, 2014**



**FEDERAL SENTENCING STATISTICAL ANALYSIS REPORT**  
*for*  
**WILLIAM PARIS**

---

Title 18 U.S.C. §3553(a)(6) directs that the “need to avoid unwarranted sentence disparities among defendants with similar records who have been found guilty of similar conduct” be considered when imposing sentence. To this end, using a data collection maintained by the United States Sentencing Commission (USSC), the National Center on Institutions and Alternatives (NCIA) has prepared a Federal Sentencing Statistical Analysis (FSSA) report in order to determine how defendants similar to Mr. Paris were sentenced in federal courts across the country. NCIA is a nonprofit organization which has worked in the sentencing field for over 36 years and has been recognized for its sentencing expertise in Courts across the country.<sup>1</sup>

**BACKGROUND OF THE USSC DATABASE**

The United States Sentencing Commission (USSC) maintains a comprehensive computerized data collection system of federal sentencing information. Pursuant to 28 U.S.C. §994(w) each chief judge of a district is required to ensure that within 30 days after entry of judgment in a criminal case the sentencing court submits a report of the sentence to the USSC that includes: (1) the judgment and commitment order; (2) the statement of reasons (including the reasons for any departures or variances); (3) any plea agreement; (4) the indictment or other charging document; (5) the presentence report; and (6) any other information the USSC needs.

---

<sup>1</sup>NCIA has operated since 1977 as a nonprofit organization. Its Criminal Justice Services (CJS) provides services to defense attorneys, clients and courts throughout the country. CJS provides individualized sentencing evaluations, research and recommendations for persons who are facing incarceration. CJS services include sentencing reports, sentencing guideline assistance, capital case assistance, parole plans, disparity analysis, research, and institutional designation/transfer. NCIA has provided services to over 20,000 clients in all 50 states and in over 75 federal jurisdictions. NCIA has prepared disparity analyses for over 175 individuals being sentenced in federal court.

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*Paris FSSA Report*  
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This data contains information on federal criminal cases sentenced under the Sentencing Guidelines and Policy Statements of the Sentencing Reform Act of 1984. The data files included in this study contain all cases received by the USSC that were sentenced between October 1, 1998 and September 30, 2012. United States Federal Courts handled over 1 million criminal cases between the fiscal years 1999 and 2012. The USSC estimates that 99% of all cases are included in this dataset.

#### **NCIA ANALYSIS**

**STEP 1:** NCIA received the data sets for fiscal years 1999-2012 from the United States Sentencing Commission (USSC).

**STEP 2:** Data files were extracted and imported into the statistical computer program SPSS utilizing the SPSS setup files provided by the USSC.

**STEP 3:** NCIA research staff selected cases to include only those cases where the information related to a defendant's guideline calculation(s) represented known court findings. That is, only those cases where the Court either agreed with the probation officer's calculations of the sentencing guidelines, or where the court clearly documented any changes it made to a defendant's guideline calculation. Total cases = 870,790 cases. (This represents approximately 86% of all cases.)

**STEP 4:** Mr. Paris pleaded guilty to violating 26 USC §7203.

NCIA research staff sorted and selected cases where the defendant violated 26 USC §7203 and only that statute.

- **Step 4 Result:**     *869,899 cases deleted*  
                              *891 cases remain*

**STEP 5:** Mr. Paris pleaded guilty to a misdemeanor violation of Title 26 U.S.C. §7203 which carries a maximum punishment of 12 months of imprisonment. Under the statute, it is possible to be guilty of a felony violation of Title 26 U.S.C. §7203 which carries a maximum punishment of 60 months of imprisonment per count.

In order to isolate misdemeanor offenders, NCIA research staff deleted those cases where the defendant's maximum punishment (the statutory maximum) was greater than 12 months of imprisonment per count.

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- **Step 5 Result:** 27 cases deleted  
864 cases remain

**STEP 6:** Mr. Paris is a Criminal History Category I. NCIA research staff deleted those cases where the defendant was not a Criminal History I.

- **Step 6 Result:** 81 cases deleted  
783 cases remain

**STEP 7:** Mr. Paris entered into a plea agreement with the Government. NCIA research staff deleted those cases where the defendant was convicted after trial.

- **Step 7 Result:** 43 cases deleted  
740 cases remain

**STEP 8:** It is our understanding that Mr. Paris will not receive a downward departure pursuant to U.S.S.G. §5K1.1. NCIA research staff deleted those cases where the defendant received a downward departure pursuant to U.S.S.G. §5K1.1.

- **Step 8 Result:** 91 cases deleted  
649 cases remain

**STEP 9:** NCIA research staff deleted those cases that contained missing or incomplete sentencing information.

- **Step 9 Result:** 4 cases deleted  
645 cases remain

**STEP 10:** NCIA research staff deleted those cases that contained missing or incomplete information regarding loss.

- **Step 10 Result:** 24 cases deleted  
621 cases remain

**STEP 11:** Mr. Paris pleaded guilty to one count. NCIA research staff deleted those cases where the defendant pleaded guilty to more than one count.

- **Step 10 Result:** 224 cases deleted  
397 cases remain

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**STEP 12:** NCIA research staff organized these 397 cases by tax loss amount according to the 2012 U.S.S.G. §2T4.1 tax loss table. NCIA research staff tallied the total number of cases where the defendant received a probationary/fine only sentence versus a sentence of imprisonment and determined the percentage of each category ("Probation/Fine Only" or "Prison"). For those who received a term of imprisonment, the average prison length was determined (this calculation does not include any months of alternative confinement as defined in U.S.S.G. §5C1.1).

#### NCIA FINDINGS

- Of the 397 defendants included in this analysis, 277 defendants (69.8%) received a probationary/fine only sentence and the remaining 120 defendants (30.2%) received a term of imprisonment (see the following chart).

Sentences Imposed Guilty-Pleading, CHI Defendants Who Violated 26 USC §7203 (Misdemeanor) (Excludes U.S.S.G. §5K1.1 Defendants) National Analysis - FY 1999-2011				
Loss Amount	Total Cases	Probation/ Fine Only	Prison	Average Prison Length
\$0 - \$30,000	n=140	127 (90.7%)	13 (9.3%)	3.2 MO
> \$30,000 - \$80,000	n=128	77 (60.2%)	51 (39.8%)	5.5 MO
> \$80,000 - \$200,000	n=89	51 (57.3%)	38 (42.7%)	6.8 MO
> \$200,000 - \$400,000	n=26	15 (57.7%)	11 (42.3%)	10.4 MO
> \$400,000 - \$1 Million	n=9	5 (55.6%)	4 (44.4%)	9.3 MO
Over \$1 Million	n=5	2 (40.0%)	3 (60.0%)	8.3 MO
All Cases	n=397	277 (69.8%)	120 (30.2%)	6.3 MO

- Of the 89 defendants with a loss of >\$80,000 - \$200,000, 5 defendants were sentenced in the 11<sup>th</sup> Circuit. Of these 5 defendants, 2 defendants (40%) received a probationary sentence and the remaining 3 defendants (60%) received a term of imprisonment (average sentence imposed was 4.0 months).

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